

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	(Jointly Administered)
	§	

Complex Case Fee Application Coversheet (Hourly)

Name of Applicant:	Stris & Maher LLP	
Applicant's Role in Case:	Special Litigation Counsel	
Docket No. of Employment Order(s):	262	
Interim Application (x) 2nd Final Application ()	Indicate whether this is an interim or final Application. If interim, indicate the number (1 st , 2 nd , 3 rd , etc.)	
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	12/1/24	2/28/25
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y)		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y)		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y)		
Do expense reimbursements represent actual and necessary expenses incurred? (Y)		
Compensation Breakdown for Time Period Covered by this Application		
Total professional fees requested in this Application:	\$1,394,833.75	

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



Total professional hours covered by this Application:	1554.0
Average hourly rate for professionals:	\$897.58
Total paraprofessional fees requested in this Application:	\$171,012.50
Total paraprofessional hours covered by this Application:	487.0
Average hourly rate for paraprofessionals:	\$351.16
Total fees requested in this Application:	\$1,565,846.25
Total expense reimbursements requested in this Application:	\$255,286.34
Total fees and expenses requested in this Application:	\$1,821,132.59
Total fees and expenses awarded in all prior Applications:	\$4,293,746.87
Plan Status: On December 11, 2024, the Court entered an order extending the exclusive period for the Debtors to file a chapter 11 plan through and including March 24, 2025 (ECF No. 571). The Debtors are scheduled to file the chapter 11 plan prior to that date.	
Primary Benefits: During the Application Period, Stris & Maher LLP represented Debtors in connection with their Motion to Assume Certain Executory Contracts with Whinstone US, Inc., including by conducting discovery, filing motions and briefing, appearing at hearings, and participating in mediation on Debtors' behalf.	

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: RHODIUM ENCORE LLC, <i>et al.</i> , ² Debtors.	§ § § § § § §	Chapter 11 Case No. 24-90448 (ARP) (Jointly Administered)
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**STRIS & MAHER LLP’S SECOND
APPLICATION FOR PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
DECEMBER 1, 2024, THROUGH FEBRUARY 28, 2025**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Stris & Maher LLP (“Stris & Maher”) files its Second Application for Payment of Compensation and Reimbursement of Expenses for the Period December 1, 2024, through February 28, 2025 (the “Application”), for allowance of compensation for professionals services provided in the amount of \$1,565,846.25 and reimbursement of actual and necessary expenses in the amount of \$255,286.34 that Stris & Maher incurred from December 1, 2024, through February

² The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

28, 2025 (the “Application Period”), as counsel to Rhodium Encore, LLC and its debtor-affiliates (collectively, “Rhodium” or the “Debtors”) in the above-captioned cases and respectfully represents as follows:

JURISDICTION

1. Stris & Maher submits this Application pursuant to §§ 330 and 331 of the Bankruptcy Code, rule 2016 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), rule 2016-1 of the Bankruptcy Local Rules (the “Local Rules”), and consistent with the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the “US Trustee Guidelines”).

2. The Court has jurisdiction over these cases pursuant to 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157(b). This Court is the proper venue pursuant to 28 U.S.C. §§ 1408 and 1409.

RELIEF REQUESTED

3. Stris & Maher requests that the Court enter an order allowing Stris & Maher’s interim compensation for professional services rendered during the Application Period in the amount of \$1,565,846.25 and reimbursement of actual and necessary expenses incurred by Stris & Maher in the amount of \$255,286.34.

BACKGROUND

4. On August 24, 2024, Rhodium Encore LLC, Jordan HPC LLC, Rhodium JV LLC, Rhodium 2.0 LLC, Rhodium 10MW LLC, and Rhodium 30MW LLC each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

5. On August 29, 2024, additional affiliates of the Initial Debtors filed, in this Court, voluntary petitions for chapter 11 relief: Rhodium Technologies LLC, Rhodium Enterprises Inc.,

Rhodium Renewables LLC, Rhodium Ready Ventures LLC, Rhodium Industries LLC, Rhodium Shared Services LLC, Rhodium Renewables Sub LLC, Rhodium 30MW Sub LLC, Rhodium Encore Sub LLC, Rhodium 10MW Sub LLC, Rhodium 2.0 Sub LLC, Air HPC LLC, and Jordan HPC Sub LLC.

6. The Debtors' cases are jointly administered as *In re Rhodium Encore, LLC, et al.*, Case No. 24-90448 (ARP).

7. On November 22, 2024, the United States Trustee (the "Trustee") filed a Notice of Appointment of Committee of Unsecured Creditors. *See* ECF No. 488. No trustee, examiner, or other official committee has been appointed in these chapter 11 cases (the "Chapter 11 Cases").

8. A detailed description of the facts and circumstances regarding the Debtors' business and capital structure and the circumstances leading to the commencement of these Chapter 11 Cases is set forth in the Declaration of David M. Dunn in Support of Chapter 11 Petitions and First Day Relief (the "First Day Declaration") (ECF No. 35).

9. On September 22, 2024, the Debtors filed the Application of Debtors for Authority to Retain and Employ Stris & Maher LLP as Attorneys Effective as of the Petition Date (the "Retention Application") (ECF No. 170). On October 14, 2024, the Court entered the order granting the Retention Application (the "Retention Order") (ECF No. 262).

10. On September 22, 2024, the Debtors filed the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the "Interim Compensation Motion") (ECF No. 174) and on October 14, 2024, the Court entered the order granting the Interim Compensation Motion (the "Interim Compensation Order") (ECF No. 264).

TERMS AND CONDITIONS OF EMPLOYMENT AND COMPENSATION

11. The terms and conditions of Stris & Maher's employment by the Debtors and compensation to be paid to Stris & Maher are outlined in the Retention Application. *See* ECF No. 170. As set forth in the Retention Application, Stris & Maher's customary fees and expenses incurred in connection with this representation are to be paid by the Debtors' estates.

PROFESSIONAL SERVICES PROVIDED TO THE DEBTORS

12. The following is a summary by task code of the professional services Stris & Maher rendered during the Application Period.

a. Matter No. 001 – Midas Green Patent Litigation: Hours: 43.9; Fees: \$45,845.00. This matter includes resolution of ongoing issues relating to the Midas Green Patent Litigation.

Professional	Hourly Rate³	Total Hours	Total Compensation
Elizabeth Brannen	\$1,250.00 / \$1,100.00	27.7	\$33,635.00
Bridget Asay	\$1,200.00 / \$1,050.00	2.3	\$2,745.00
Ken Halpern	\$1,100.00 / \$900.00	6.3	\$6,930.00
Andrew Atsalis	\$350.00 / \$325.00	7.6	\$2,535.00
Total		43.9	\$45,845.00

b. Matter No. 004 – Whinstone Dispute, Excluding Tarrant County Litigation: Hours: 1927.7; Fees: \$1,475,585.00. This matter includes regular meetings with clients and co-counsel, work related to conducting discovery including document collection and review and depositions, preparation of expert and percipient witnesses for hearings, filing of motions and

³ Stris & Maher LLP increased its rates effective January 1, 2025. Because Stris & Maher timekeepers performed work in 2024 and 2025 for which fees are sought in this application, the tables herein list both 2024 and 2025 rates for timekeepers.

briefing, appearing at hearings and status conferences, and preparing for and participating in mediation on the Debtors' behalf.

Professional	Hourly Rate	Total Hours	Total Compensation
Peter K. Stris	\$1,450.00 / \$1,250.00	20.5	\$29,725.00
Elizabeth Brannen	\$1,250.00 / \$1,100.00	164.3	\$204,400.00
Bridget Asay	\$1,200.00 / \$1,050.00	152.7	\$180,630.00
Tillman Breckenridge	\$1,200.00 / \$1,050.00	66.3	\$79,560.00
Victor O'Connell	\$1,025.00 / \$875.00	31.5	\$31,537.50
John Stokes	\$1,025.00 / \$875.00	211.6	\$210,275.00
Colleen Smith	\$850.00 / \$725.00	200.7	\$168,832.50
Peter Brody	\$850.00 / \$725.00	71.4	\$60,315.00
Sarah Rahimi	\$750.00 / \$650.00	143.7	\$107,775.00
Helen Marsh	\$700.00 / \$600.00	154	\$105,590.00
Tanya Tice	\$525.00 / \$480.00	257.9	\$135,397.50
Monica Viramontes	\$425.00 / \$400.00	50.1	\$21,292.50
Andrew Atsalis	\$350.00 / \$325.00	113.2	\$39,480.00
Cynthia Huang	\$350.00 / \$325.00	98.2	\$34,175.00
Sebastian Delgado	\$350.00 / \$325.00	3.1	\$1,085.00
Shayra Banta	\$350.00 / \$325.00	23.2	\$8,120.00
Nicholas Capalbo	\$350.00 / \$325.00	57.7	\$20,195.00
Jaida Hodge-Adams	\$350.00 / \$325.00	107.6	\$37,200.00
Total		1927.7	\$1,475,585.00

c. Matter No. 007 – Retention and Fee Application: Hours: 36.8; Fees: \$31,037.50. This matter includes preparing monthly fee statements, preparing the first interim fee statement, and redaction of confidential and privileged information.

Professional	Hourly Rate	Total Hours	Total Compensation
Elizabeth Brannen	\$1,250.00 / \$1,100.00	14.2	\$17,060.00
Victor O'Connell	\$1,025.00 / \$875.00	9.3	\$9,322.50
Cynthia Huang	\$350.00 / \$325.00	9.7	\$3,395.00
Nicholas Capalbo	\$350.00 / \$325.00	3.6	\$1,260.00
Total		37.2	\$31,037.50

d. Matter No. 008 – Non-working Travel for Whinstone Dispute: Hours: 32.6;

Fees: \$13,378.75. This matter includes travel to and from Texas.

Professional	Hourly Rate	Total Hours	Total Compensation ⁴
Bridget Asay	\$1,200.00 / \$1,050.00	12.1	\$7,260.00
Victor O’Connell	\$1,025.00 / \$875.00	7.5	\$3,843.75
Andrew Atsalis	\$350.00 / \$325.00	13	\$2,275.00
Total		32.6	\$13,378.75

COMPENSATION REQUESTED

13. In this Application, Stris & Maher seeks approval of \$1,565,846.25 in fees and \$255,286.34 in expenses incurred from December 1, 2024, through February 28, 2025. Attached as Exhibit A is the Certification of Victor O’Connell in Support of Stris & Maher’s Second Application for Payment of Compensation and Reimbursement of Expenses for the Period December 1, 2024, through February 28, 2025 (the “O’Connell Declaration”). Pursuant to the US Trustee Guidelines, Exhibit B is a table reflecting customary and comparable compensation disclosures with the Application. Exhibit C is a table summarizing the timekeepers included in this Application. Exhibit D addresses the budget and Exhibit E is a table with a summary of compensation requested by task category. The blended rate for Stris & Maher timekeepers in this Application is \$767.20.

14. During the Application Period, Stris & Maher filed its (a) Fourth Monthly Fee Statement for the Period December 1, 2024, through December 31, 2024 (the “Fourth Monthly Fee Statement”) (ECF No. 653); (b) Fifth Monthly Fee Statement for the Period January 1, 2025, through January 31, 2025 (the “Fifth Monthly Fee Statement”) (ECF No. 818); and (c) Sixth

⁴ Stris & Maher has billed its time for travel in connection with the Whinstone dispute during which no work was performed on a separate invoice at a 50% discount. This discount is reflected under total compensation.

Monthly Fee Statement for the Period February 1, 2024 through February 28, 2025 (the “Sixth Monthly Fee Statement”) (ECF No. 900) (collectively, the “Monthly Fee Statements”).

15. This Application meets the standards of § 331 and applicable case law for compensation for services rendered on behalf of the Debtors’ estates and for the administration of the Chapter 11 Cases. In *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015), the Fifth Circuit reorganized the contours of the requirements for allowance of compensation under § 330. In *Woerner*, the Fifth Circuit held that a court would allow compensation for services rendered by an attorney that are “reasonably likely to benefit” the estate, and that reasonableness should be assessed “at the time at which the service was rendered.” *Id.* at 273–74. The compensation requested in the Application meets the requirements for compensation the Fifth Circuit identified in *Woerner*, and therefor satisfies the requirements for compensation under § 331 and should be approved.

16. Stris & Maher provided necessary and beneficial services to the Debtors in a myriad ways. See the attached Monthly Fee Statements for a detailed description of the services provided during the Application Period. These efforts were consistent with the *Johnson*⁵ factors adopted by the Fifth Circuit in *In re First Colonial Corp.*, 544 F.2d 1291, 1299 (5th Cir. 1977), as follows:

a. The Time and Labor Required

17. As further illustrated by the Summary Cover Sheet, the amount of time spent by Stris & Maher professionals and paraprofessionals on this case for the Application Period was 2041.0 hours. The amount of time was reasonable and necessary given the complexity and stakes of the Whinstone Litigation.

⁵ See generally *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974).

b. The Novelty and Difficulty of the Questions Presented by the Case

18. This case has presented difficult questions of fact and law relevant to both bankruptcy and applicable nonbankruptcy law.

c. The Skill Requisite to Perform the Legal Services Properly

19. Stris & Maher possesses the skill required to properly perform the legal services involved, including trial expertise and experience with high-stakes commercial litigation.

d. The Preclusion of Other Employment by the Attorneys due to Acceptance of this Case

20. Attorneys at Stris & Maher were precluded from employment on other cases due to the size and exigency of the Whinstone Litigation.

e. The Customary Fee for Similar Work in the Community

21. The fees charged by Stris & Maher are comparable to fees charged by other counsel in similar cases in this jurisdiction. Stris & Maher sets its fees consistent with available market data for situated firms given the years of experience of each attorney. Stris & Maher's blended rates of \$897.58 for professionals and \$351.16 for paraprofessionals compare favorably with hourly rates charged by practitioners in cases of this size, complexity, and significance

f. Whether the Fees are Fixed or Contingent

22. Stris & Maher's attorneys in these cases do not charge either fixed or contingent fees.

g. Time Pressure Imposed by the Client or Circumstances

23. The circumstances of the bankruptcy case imposed time pressures due to the expedited discovery and briefing schedule for the court's hearing on Debtors' Motion to Assume Certain Executory Contracts with Whinstone US, Inc. (ECF No. 7).

h. The Amount Involved and Results Obtained as a Result of the Attorney Services

24. As a result of Stris & Maher's services, strategy, and efficiency as special litigation counsel to the Debtors during the Application Period, the Debtors were prepared for the phase two hearing on Debtors' Motion to Assume Certain Executory Contracts with Whinstone US, Inc. (ECF No. 579), were prepared to pursue substantial damages claims against Whinstone US, Inc., and were ultimately able to mediate and settle the dispute with Whinstone, in an agreement that will recover \$186 million in cash and stock for Debtors (ECF Nos. 880, 921).

i. The Experience, Reputation, and Ability of the Attorneys

25. The Stris & Maher attorneys involved in the work on behalf of the debtors have decades of experience in high-stakes litigation and extensive knowledge of Debtors' business, corporate structure, and the legal issues and relevant evidence at issue in this matter.

j. The Undesirability of the Cases

26. Every bankruptcy case carries some risks due to the uncertainty of payment stemming from the relatively unknown value of the debtors' principal assets and the debtors' ability to pay administrative fees and costs. These cases presented no additional undesirable elements.

k. The Nature and Length of the Professional Relationship with the Client

27. As stated in the Retention Application, Stris & Maher has a longstanding professional relationship with Debtors. In particular, Debtors have employed Stris & Maher to represent them in the Midas Green Patent Litigation since March 31, 2023; the Temple Green Data Matter since April 13, 2023; and the Whinstone Dispute since April 30, 2023.

I. Awards in Similar Cases

28. The fees requested in this Application are in line with fee awards approved in similar cases by counsel with similar sophistication and experience.

CONCLUSION

29. The services provided by Stris & Maher have been necessary to the administration of the Debtors' estates and were beneficial at the time the services were rendered. Further, Stris & Maher performed the services within a reasonable amount of time, commensurate with the complexity, importance, nature of the problems, issues, and tasks addressed on behalf of the Debtors. Finally, the compensation sought is reasonable based on the customary compensation charged by comparably skilled practitioners in cases under title 11 of this district.

30. Stris & Maher requests that the Court determine that the nature, extent, and value of these services were appropriate under the circumstances at the time the services were rendered. Stris & Maher requests that this Court enter an order granting this second interim application for professional services rendered during the Application Period in the amount of \$1,565,846.25 and reimbursement of actual and necessary expenses incurred by Stris & Maher during the Application Period in the amount of \$255,286.34, authorizing the Debtors to pay the fees and expenses as requested, and grant such other and further relief as is just and proper.

Respectfully submitted this 17th day of April, 2025.

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

/s/ Patricia B. Tomasco

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Cameron Kelly (SBN 24120936)

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-and-

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Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that, on April 17, 2025, a true and correct copy of the foregoing Monthly Fee Statement was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco

Patricia B. Tomasco

EXHIBIT A
CERTIFICATION OF VICTOR O'CONNELL IN SUPPORT OF STRIS & MAHER
LLP'S SECOND APPLICATION FOR PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	(Jointly Administered)
	§	

**CERTIFICATION OF VICTOR O’CONNELL IN SUPPORT OF
STRIS & MAHER LLP’S SECOND APPLICATION FOR
PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD
DECEMBER 1, 2024, THROUGH FEBRUARY 28, 2025**

I, Victor O’Connell, hereby certify that:

I am a Partner of the law firm Stris & Maher LLP (“Stris & Maher”).

This certification (the “Certification”) is made in connection with Stris & Maher’s fee application dated April 18, 2025 (the “Application”) for compensation and reimbursement of expenses for the period commencing December 1, 2024, through February 28, 2025 (the “Application Period”). I have reviewed the Application and hereby certify that, to the best of my knowledge, information, and belief, the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and Fee Guidelines.²

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

² Capitalized terms used herein but not defined shall have the meanings ascribed to such terms in the Application.

Stris & Maher discussed its rates and fees with the Debtors at the outset of these cases and has continued to discuss fees with the Debtors throughout these cases. Attorneys and paraprofessionals assigned to this matter were necessary to assist with the prosecution of the Debtors' chapter 11 cases, preservation of the Debtors' assets and other matters described herein. Neither a budget nor a staffing plan were prepared or discussed with the Debtors in these chapter 11 cases.

In accordance with the Fee Guidelines, I, on behalf of Stris & Maher, respond to the best of my knowledge, information, and belief to the questions identified therein as follows:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: Stris & Maher agreed to provide a 10% discount on its fees in the Tarrant County Litigation matter. *See* Retention Application, ECF No. 170.

If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher than 10% or more, did you discuss the reasons for the variation with the Client?

Response: A budget was not prepared.

Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: No.

Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: Yes; 17.8 hours (total fees of \$18,320).

If the fee application includes any rate increases since retention:

Did your client review and approve those rate increases in advance?

Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modify rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: Yes.

Dated: April 18, 2025

Cerritos, California

/s/ Victor O'Connell
Victor O'Connell

EXHIBIT B
CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES WITH FEE APPLICATIONS

Category of Timekeeper (using categories already maintained by the firm)	Blended Hourly Rate	
	BILLED OR COLLECTED Firm or offices for the preceding year	BILLED In this fee application
Partner	\$839.22	\$1,124.77
Associate	\$640.96	\$698.21
Paraprofessionals	\$288.61	\$351.16
All Timekeepers Aggregate	\$689.80	\$767.20

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: April 18, 2025

Interim or Final: Interim

EXHIBIT C
SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION

Professional	Position	Year Admitted	Hourly Rate⁸	Total Hours	Total Compensation⁹
Peter K. Stris	Founding Partner	2001	\$1,450.00 / \$1,250.00	20.5	\$29,725.00
Elizabeth Brannen	Managing Partner	2001	\$1,250.00 / \$1,100.00	206.2	\$255,095.00
Bridget Asay	Partner	1997	\$1,200.00 / \$1,050.00	167.1	\$190,635.00
Tillman Breckenridge	Partner	2003	\$1,200.00 / \$1,050.00	66.3	\$79,560.00
Ken Halpern	Partner	1997	\$1,100.00 / \$900.00	6.3	\$6,930.00
Victor O'Connell	Partner	2012	\$1,025.00 / \$875.00	48.3	\$44,703.75
John Stokes	Partner	2016	\$1,025.00 / \$875.00	211.6	\$210,275.00
Colleen Smith	Associate	2015	\$850.00 / \$725.00	200.7	\$168,832.50
Peter Brody	Associate	2016	\$850.00 / \$725.00	71.4	\$60,315.00
Sarah Rahimi	Associate	2019	\$750.00 / \$650.00	143.7	\$107,775.00
Helen Marsh	Associate	2024	\$700.00 / \$600.00	154.0	\$105,590.00
Tanya Tice	Discovery Associate	1989	\$525.00 / \$480.00	257.9	\$135,397.50
Monica Viramontes	Senior Paralegal	N/A	\$425.00 / \$400.00	50.1	\$21,292.50
Andrew Atsalis	Litigation Fellow	N/A	\$350.00 / \$325.00	133.8	\$44,290.00
Cynthia Huang	Litigation Fellow	N/A	\$350.00 / \$325.00	107.9	\$37,570.00
Sebastian Delgado	Litigation Fellow	N/A	\$350.00 / \$325.00	3.1	\$1,085.00
Shayra Banta	Litigation Fellow	N/A	\$350.00 / \$325.00	23.2	\$8,120.00
Nicholas Capalbo	Litigation Fellow	N/A	\$350.00 / \$325.00	61.3	\$21,455.00

⁸ Stris & Maher LLP increased its rates effective January 1, 2025. Because Stris & Maher timekeepers performed work in 2024 and 2025 for which fees are sought in this application, the tables herein list both 2024 and 2025 rates for timekeepers.

⁹ These figures are net of the 50% discount for non-working travel.

Jaida Hodge-Adams	Litigation Fellow	N/A	\$350.00 / \$325.00	107.6	\$37,200.00
Total				2041.0	\$1,565,846.25

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: April 18, 2025

Interim or Final: Interim

EXHIBIT D
BUDGET

A budget was not prepared in this case. Stris & Maher continues to work with the Debtors to ensure efficient and cost-effective service to the Debtors' estates.

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: April 18, 2025

Interim or Final: Interim

EXHIBIT E
SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

Matter #	Matter Description	Hours Budgeted	Fees Budgeted	Hours Billed	Fees Sought
001	Midas Green Patent Litigation	-	-	43.9	\$45,845.00
004	Whinstone Dispute, Excluding Tarrant County Litigation	-	-	1927.7	\$1,475,585.00
007	Retention and Fee Application	-	-	36.8	\$31,037.50
008	Non-Working Travel for Whinstone Dispute	-	-	32.6	\$13,378.75
Total				2041.0	\$1,565,846.25

Case Name: *In re Rhodium Encore LLC, et al.*

Case Number: 24-90448 (ARP)

Applicant's Name: Stris & Maher LLP

Date of Application: April 18, 2025

Interim or Final: Interim

EXHIBIT F
INVOICES SUBMITTED WITH MONTHLY FEE STATEMENTS
DECEMBER 1, 2024 TO FEBRUARY 28, 2025



January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14380
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Midas Green Litigation

Total Professional Services	\$ 8,990.00
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 8,990.00
Previous Balance	<u>\$ 4,926.00</u>
TOTAL BALANCE DUE	<u>\$ 13,916.00</u>

Stris & Maher LLP

Invoice # 14380

January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/06/24	EB	Review and analyze motion to lift bankruptcy stay to permit resolution of patent case (0.4); correspond with R. Harrington (0.1) and confer with P. Tomasco and R. Harrington (0.2) and Texas counsel (0.2) regarding same.	.90	1100.00	990.00
12/08/24	EB	Review materials in support of request for entry of summary judgment order.	.10	1100.00	110.00
12/09/24	EB	Review and respond to correspondence from Texas counsel regarding steps to seek entry of summary judgment order.	.10	1100.00	110.00
12/10/24	EB	Correspond with R. Harrington regarding proposed revisions to motion to lift stay to permit entry of judgment and next steps in support of same.	.80	1100.00	880.00
12/16/24	BA	Review proposed motion to lift stay in Midas Green litigation and correspond with EB regarding same.	.10	1050.00	105.00
12/17/24	EB	Correspond with [REDACTED] regarding [REDACTED].	.10	1100.00	110.00
12/19/24	EB	Correspond with co-counsel R. Harrington regarding status of bankruptcy court submission requesting to lift stay.	.50	1100.00	550.00
12/20/24	EB	Correspond with R. Harrington and Texas counsel regarding submissions to bankruptcy and district courts to request written ruling on summary judgment order (0.8); advise NC and MN regarding draft motion and proposed order seeking same (0.4).	1.20	1100.00	1,320.00
12/23/24	EB	Review draft motion and proposed order asking district court to enter summary judgment order (0.1); advise MN regarding revisions to same (0.2).	.30	1100.00	330.00
12/27/24	EB	Continue revising and drafting portions of motion for order on summary judgment (1.3); review supporting research from ASA (0.1); advise ASA regarding further revisions in light of same (0.2).	1.60	1100.00	1,760.00
12/27/24	ASA	Conducting research and review relevant transcript material to assist EB with portions of motion for written summary judgment order.	2.00	325.00	650.00

Stris & Maher LLP

Invoice # 14380

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/30/24	EB	Review updated drafts (0.1); advise ASA regarding further changes (0.1); and continue revising draft motion for entry of written order confirming grant of summary judgment (0.3).	.50	1100.00	550.00
12/30/24	ASA	Draft proposed order and portions of motion for written summary judgment order for EB and assist with revisions to same.	3.00	325.00	975.00
12/31/24	EB	Continue revising motion for entry of written summary judgment order.	.50	1100.00	550.00

TOTAL PROFESSIONAL SERVICES**\$ 8,990.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.60	1,100.00	7,260.00
Bridget Asay	BA	Partner	.10	1,050.00	105.00
Andrew Atsalis	ASA	Fellow	5.00	325.00	1,625.00
Total			11.70		\$ 8,990.00

TOTAL THIS INVOICE**\$ 8,990.00**

Stris & Maher LLP

Invoice # 14380

January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00
14330	12/19/24	4,425.00	.00	4,425.00
Previous Balance				\$ 4,926.00
Balance Due This Invoice				<u>\$ 8,990.00</u>
TOTAL BALANCE DUE				<u>\$ 13,916.00</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 4,425.00	\$ 198.00	\$ 303.00	\$.00	\$.00	\$ 4,926.00



January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14366
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Whinstone Litigation

Total Professional Services	\$ 104,375.00
Total Expenses Advanced	<u>\$ 27,827.25</u>
TOTAL THIS INVOICE	\$ 132,202.25
 Previous Balance	 <u>\$ 1,722,783.12</u>
TOTAL BALANCE DUE	<u>\$ 1,854,985.37</u>

Trust Funds Remaining on Account \$ 115,369.59

Stris & Maher LLP

Invoice # 14366

January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/02/24	JH	Organize case materials including review and update of bankruptcy docket.	3.00	325.00	975.00
12/03/24	BA	Participate in portion of teleconference with potential [REDACTED] expert [REDACTED], with JS, W. Thompson, and A. Davis (0.5); participate in weekly client call with bankruptcy and litigation counsel (0.4); evaluate next steps (0.1).	1.00	1050.00	1,050.00
12/03/24	JS	Attend call with potential [REDACTED] expert (0.6); attend portion of weekly touch-point call (0.6); evaluate next steps in light of same (0.7).	1.90	875.00	1,662.50
12/03/24	JH	Continue organizing materials for phase 2 and updating bankruptcy docket.	2.00	325.00	650.00
12/04/24	JS	Confer with W. Thompson and J. Cohn regarding timing and strategy for [REDACTED] phase (0.5); review [REDACTED] agreements and evaluate same in connection with potential [REDACTED] (1.7); confer with P. Tomasco regarding same (0.3).	2.50	875.00	2,187.50
12/04/24	CHH	Review and update matter docket.	.10	325.00	32.50
12/04/24	JH	No Charge - Update docket (0.5); review November 26 status conference hearing audio and transcript (2.5).	3.00	325.00	N/C
12/05/24	BA	Correspond with bankruptcy counsel and with JS and PB regarding proposed disclosure of [REDACTED] materials [REDACTED] to creditors' committee.	.30	1050.00	315.00
12/05/24	JS	Work on strategy for [REDACTED] of litigation.	1.90	875.00	1,662.50
12/05/24	CHH	Review and update matter review and update matter docket.	.20	325.00	65.00
12/05/24	JH	No Charge - Update bankruptcy docket.	1.40	325.00	N/C
12/05/24	ASA	Organize case materials including audio files received from court.	.20	325.00	65.00
12/06/24	BA	Participate in teleconference with JS, W. Thompson, A. Davis, and potential [REDACTED] expert for [REDACTED] (0.7); correspond with JS and EB regarding potential additional [REDACTED] modeling by [REDACTED] (0.1).	.80	1050.00	840.00

Stris & Maher LLP

Invoice # 14366

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/06/24	JH	Update bankruptcy docket.	.80	325.00	260.00
12/06/24	EZ	No Charge - Update Bankruptcy docket (1.0).	1.00	325.00	N/C
12/09/24	EB	Attention to case management.	.40	1100.00	440.00
12/09/24	BA	Review and correspond with litigation team regarding revisions to materials for [REDACTED] (0.7); review and manage response to request from bankruptcy counsel regarding sharing of [REDACTED] materials in compliance with protective order requirements (0.4).	1.10	1050.00	1,155.00
12/09/24	JS	Review, evaluate, and prepare correspondence regarding [REDACTED] in relation to Whinstone litigation.	2.40	875.00	2,100.00
12/09/24	HM	Advise and assist CHH to compile [REDACTED] and corresponding [REDACTED] for creditors' counsel.	1.10	600.00	660.00
12/10/24	JS	Further review and revise slides regarding [REDACTED].	.90	875.00	787.50
12/10/24	CHH	Compile and edit [REDACTED] for creditors' committee's review.	1.50	325.00	487.50
12/10/24	HM	Advise and assist CHH to compile deposition exhibits for creditors' counsel.	.50	600.00	300.00
12/11/24	EB	Correspond with JS and BA regarding additional analysis by [REDACTED] (0.1); attend teleconference with [REDACTED] regarding same (0.1).	.20	1100.00	220.00
12/11/24	BA	Correspond with JS, W. Thompson, J. Cohn, and A. Davis regarding [REDACTED] expert (0.1); correspond with EB and JS regarding next steps for additional [REDACTED] from [REDACTED] (0.2).	.30	1050.00	315.00
12/11/24	JS	Further evaluate next steps on [REDACTED] phase of case (1.3); further review slides and email regarding [REDACTED] (0.6).	1.90	875.00	1,662.50
12/11/24	CHH	Continue compiling [REDACTED] materials for creditors' counsel.	5.00	325.00	1,625.00
12/11/24	JH	Update bankruptcy docket.	2.30	325.00	747.50
12/11/24	ASA	Update internal memoranda regarding additional developments.	1.00	325.00	325.00

Stris & Maher LLP

Invoice # 14366

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/11/24	HM	Attention to documents collected for creditors' counsel (2.0); coordinate with Todd Stefan of Setec Investigations and [REDACTED] to transfer [REDACTED] data to [REDACTED] (0.4).	2.40	600.00	1,440.00
12/12/24	EB	Correspond with BA and [REDACTED] regarding teleconference to discuss information in support of [REDACTED] analysis (0.1); correspond with [REDACTED] and [REDACTED] regarding same (0.1).	.20	1100.00	220.00
12/13/24	EB	Prepare for (0.5) and attend (0.4) teleconference with BA, ASA, and [REDACTED] to discuss information in support of [REDACTED] analysis; attention to resulting action items including correspondence to client regarding open questions (0.3).	1.20	1100.00	1,320.00
12/13/24	BA	Prepare for (0.2) and attend teleconference with [REDACTED], EB, BA, and ASA regarding information in support of [REDACTED] analysis (0.3); correspond with JS and team regarding sharing [REDACTED] (0.1).	.60	1050.00	630.00
12/13/24	JS	Work on 50(b) opposition.	8.00	875.00	7,000.00
12/13/24	ASA	Attend teleconference with [REDACTED], EB, and BA regarding information in support of [REDACTED] analysis (0.3); refine and circulate notes from call (0.1); confirm confidentiality of relevant documents to discuss with client (0.5).	.90	325.00	292.50
12/16/24	EB	Prepare for (0.5) and attend (0.6) teleconference with BA, ASA, [REDACTED] and [REDACTED] regarding information in support of [REDACTED] analysis; attention to resulting action items (0.2); review correspondence regarding and begin reviewing interim order on motion to assume (0.2)	1.50	1100.00	1,650.00
12/16/24	BA	Attend call with EB, BA, ASA, [REDACTED] and expert [REDACTED] regarding information in support of [REDACTED] analysis (0.6).	.60	1050.00	630.00
12/16/24	JS	Attention to high-priority action items in connection with phase two [REDACTED].	3.30	875.00	2,887.50
12/16/24	CS	Review and analyze bankruptcy court order on phase 1 of motion to assume executory contracts.	1.00	725.00	725.00
12/16/24	JH	Update bankruptcy docket.	1.00	325.00	325.00

Stris & Maher LLP

Invoice # 14366

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/16/24	PB	Review and analyze bankruptcy court trial order.	1.20	725.00	870.00
12/16/24	ASA	Attend call with EB, BA, [REDACTED] and expert [REDACTED] regarding information in support of [REDACTED] analysis (0.6); draft and circulate notes (0.4); create shared folder and link to facilitate upload of material by client (0.3).	1.30	325.00	422.50
12/16/24	HM	Review and analyze interim order on phase 1 of the motion to assume.	2.00	600.00	1,200.00
12/17/24	BA	Correspond with bankruptcy counsel regarding [REDACTED] for sharing with creditors committee, and correspond with JHA and HM to direct preparation of same (0.3); review court's phase 1 ruling (0.8).	1.10	1050.00	1,155.00
12/17/24	JS	Review and evaluate research issues and strategy in connection with phase two [REDACTED].	2.00	875.00	1,750.00
12/18/24	EB	Attend teleconference with BA and JS regarding status and high priority action items in support of phase two [REDACTED] claim (0.5); attend teleconference with JS, CS, PB and HM regarding research and high priority action items [REDACTED] (0.4); correspond with ASA and [REDACTED] regarding information in support of [REDACTED] analysis (0.1).	1.00	1100.00	1,100.00
12/18/24	BA	Confer with JS and EB regarding priority action items including [REDACTED] and [REDACTED] analyses.	.50	1050.00	525.00
12/18/24	JS	Review and evaluate order on phase 1 and high-priority action items in connection with phase two and [REDACTED] (3.2); attend teleconferences with EB and BA (0.5) and EB, CS, PB, and HM (0.4) regarding same.	4.10	875.00	3,587.50
12/18/24	CS	Teleconference with EB, HM, JS, HM, and PB regarding research and high priority action items [REDACTED] (0.4).	.40	725.00	290.00
12/18/24	JH	Prepare materials for Quinn Emmanuel co-counsel [REDACTED] at HM request.	5.00	325.00	1,625.00
12/18/24	PB	Teleconference with EB, JS, CS, and HM regarding research projects and high-priority action items.	.40	725.00	290.00

Stris & Maher LLP

Invoice # 14366

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/18/24	ASA	No Charge - Review and analyze bankruptcy court order on phase 1 of motion to assume executory contracts (0.9).	.90	325.00	N/C
12/18/24	HM	Teleconference with EB, JS, CS, and PB regarding research and high priority action items in support of [REDACTED] (0.4); coordinate with JHA to collect, quality check, and send [REDACTED] to [REDACTED] to creditors' counsel (3.1).	3.50	600.00	2,100.00
12/19/24	VO	Confer with [REDACTED] regarding materials including [REDACTED] update and drafting of notice [REDACTED] (0.1); prepare same (1.9); emails with team regarding same and incorporate team comments (0.3); review [REDACTED] contract and prepare draft notice [REDACTED] (0.4); emails with PB regarding same (0.1).	2.80	875.00	2,450.00
12/19/24	EB	Review documentation from [REDACTED] (0.1); advise ASA regarding analysis of and questions concerning same (0.1).	.20	1100.00	220.00
12/19/24	BA	Review and revise draft materials regarding phase 1 and correspond with JS regarding same (0.2); review email from Whinstone's counsel regarding conferral for phase 2, correspond with JS regarding same, and propose draft response to same to litigation team (0.4); correspond with JS, PB, and HM regarding support for co-counsel response to creditors' committee request for information (0.3); review correspondence with [REDACTED] and P. Brody regarding technical steps for upcoming production (0.2).	1.10	1050.00	1,155.00
12/19/24	JS	Further evaluate high priority research issues in connection with phase two [REDACTED].	1.50	875.00	1,312.50
12/19/24	ASA	Analyze updated [REDACTED] spreadsheet, summarize updates for EB and BA, and provide spreadsheet to [REDACTED].	2.00	325.00	650.00
12/19/24	HM	Conduct research for [REDACTED] case (4.2); review and respond to team correspondence regarding materials provided to creditors' counsel (0.5).	4.70	600.00	2,820.00
12/20/24	VO	Review, comment, and correspond with client representatives regarding phase 1 update materials.	.40	875.00	350.00
12/20/24	VO	Correspond with PB regarding notice to begin services [REDACTED].	.10	875.00	87.50

Stris & Maher LLP

Invoice # 14366

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/20/24	EB	Confer with PB regarding action items in support of [REDACTED] phase (0.1); correspond with BA and JS regarding same (0.1); correspond with [REDACTED], BA and ASA regarding additional documentation and advise ASA regarding provision of same to [REDACTED] (0.2); review research updates from HM (0.2).	.60	1100.00	660.00
12/20/24	BA	Review and analyze phase one decision with respect to strategy and options for phase 2 (3.5); correspond with JS, [REDACTED], and [REDACTED] regarding response to Whinstone's counsel regarding phase 2 conferral, and revise and send same to Whinstone's counsel (0.4); correspond with EB regarding data for [REDACTED] (0.1).	4.00	1050.00	4,200.00
12/20/24	CS	Review and analyze Texas law regarding [REDACTED] in contract disputes [REDACTED].	5.90	725.00	4,277.50
12/20/24	ASA	Share updated [REDACTED] spreadsheet with expert [REDACTED] via secure link.	.20	325.00	65.00
12/20/24	HM	Conduct research for [REDACTED] case.	2.60	600.00	1,560.00
12/21/24	HM	Continue research for [REDACTED] case.	2.70	600.00	1,620.00
12/23/24	BA	Continue reviewing and analyzing phase one decision and correspond with JS regarding same (1.0); review research from HM and PB regarding [REDACTED] issues related to [REDACTED] and further research same (1.0); review correspondence from Whinstone's counsel regarding phase 2 and correspond with JS and PB regarding same (0.2); review correspondence from [REDACTED] regarding client matter, confer with JS regarding same, and propose edits to potential [REDACTED] communication (0.5).	2.70	1050.00	2,835.00
12/23/24	JS	Attention to high-priority action items in connection with phase two [REDACTED].	5.50	875.00	4,812.50
12/23/24	CS	Continue reviewing and analyzing Texas law regarding [REDACTED] in contract disputes [REDACTED].	3.70	725.00	2,682.50
12/23/24	PB	Correspondence regarding questions from counsel for special committee.	.30	725.00	217.50

Stris & Maher LLP

Invoice # 14366

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/24/24	CS	Continue reviewing and analyzing Texas law regarding [REDACTED] in contract disputes [REDACTED].	3.10	725.00	2,247.50
12/26/24	VO	Finalize and submit [REDACTED] (0.5); confer with Rhodium legal counsel regarding same (0.1); emails with client regarding same (0.1).	.70	875.00	612.50
12/26/24	BA	Correspond with bankruptcy counsel regarding disclosures to creditors' committee.	.30	1050.00	315.00
12/26/24	JS	Review and evaluate [REDACTED] memoranda and next steps on same in connection with phase two [REDACTED].	2.80	875.00	2,450.00
12/26/24	JH	Update bankruptcy docket and review ongoing correspondence.	3.50	325.00	1,137.50
12/27/24	BA	Continue researching issues relating to [REDACTED] and correspond with JS regarding same; (1.5); review and revise proposed response to opposing counsel regarding phase 2, correspond with JS regarding same, and convey response to opposing counsel (0.4); correspond with VO regarding availability of trial transcripts (0.1).	1.90	1050.00	1,995.00
12/27/24	JS	Further evaluate research and discovery issues in connection with phase two [REDACTED].	1.00	875.00	875.00
12/27/24	JH	Send bankruptcy trial transcripts to VO.	.80	325.00	260.00
12/27/24	PB	Research regarding [REDACTED] clauses.	1.10	725.00	797.50
12/30/24	VO	Confer with JS regarding planning for Phase 2 (0.5); further confer with JS and EB regarding same (0.5).	1.00	875.00	875.00
12/30/24	EB	Confer with VO and JS regarding high priority action items in support of phase 2 [REDACTED] (0.5); confer with BA regarding expert-related action items in support of same (0.1); correspond with HM regarding [REDACTED] memorandum (0.2); correspond with CS regarding revisions to [REDACTED] expert deposition outline (0.1).	.90	1100.00	990.00

Stris & Maher LLP

Invoice # 14366

January 13, 2025

Date	Tkpr	Description	Hours	Rate	Amount
12/30/24	BA	Review correspondence from opposing counsel regarding case schedule and correspond with team regarding further response (0.3); review client inquiry regarding delivery of new miners and correspond with litigation team regarding response to same (0.2).	.50	1050.00	525.00
12/30/24	JS	Call with EB and VO regarding high priority action items for [REDACTED] (0.5); call with VO regarding high priority action items for [REDACTED] (0.5); review materials in connection with [REDACTED] (1.3).	2.30	875.00	2,012.50
12/31/24	EB	Correspond with BA and JS regarding analysis of [REDACTED] [REDACTED] ancillary services charges (0.2); attention to case management (0.1).	.30	1100.00	330.00
12/31/24	BA	Correspond with litigation team regarding issues related to phase 2 and correspond with opposing counsel regarding same.	.60	1050.00	630.00
12/31/24	JS	Continue research in connection with high-priority action items in connection with [REDACTED] phase.	2.10	875.00	1,837.50
12/31/24	CHH	Prepare Imperium discovery uploads for transmission to [REDACTED].	1.00	325.00	325.00
12/31/24	HM	Conduct research for [REDACTED].	2.60	600.00	1,560.00
TOTAL PROFESSIONAL SERVICES				\$ 104,375.00	

Stris & Maher LLP

Invoice # 14366

January 13, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	6.50	1,100.00	7,150.00
Bridget Asay	BA	Partner	17.40	1,050.00	18,270.00
Victor O'Connell	VO	Partner	5.00	875.00	4,375.00
John Stokes	JS	Partner	44.10	875.00	38,587.50
Colleen Smith	CS	Associate	14.10	725.00	10,222.50
Peter Brody	PB	Associate	3.00	725.00	2,175.00
Helen Marsh	HM	Associate	22.10	600.00	13,260.00
Andrew Atsalis	ASA	Fellow	5.60	325.00	1,820.00
Cynthia Huang	CHH	Fellow	7.80	325.00	2,535.00
Jaida Hodge-Adams	JH	Fellow	18.40	325.00	5,980.00
Total			144.00		\$ 104,375.00

EXPENSES ADVANCED

Date	Task	Description	Amount
12/01/24		Logikcull December invoice.	1,976.00
12/20/24		StoneTurn Group - Professional services rendered for November 2024.	25,851.25
TOTAL EXPENSES ADVANCED			\$ 27,827.25
TOTAL THIS INVOICE			\$ 132,202.25

Stris & Maher LLP

Invoice # 14366

January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00
14317	12/19/24	1,183,151.62	.00	1,183,151.62
Previous Balance				\$ 1,722,783.12
Balance Due This Invoice				<u>\$ 132,202.25</u>
TOTAL BALANCE DUE				<u>\$ 1,854,985.37</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
1,183,151.62	\$ 303,157.00	\$ 236,474.50	\$.00	\$\$.00	1,722,783.12



January 13, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14381
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through December 31, 2024

RE: Retention and Fee Applications

Total Professional Services	\$ 6,285.00
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 6,285.00
Previous Balance	<u>\$ 58,220.00</u>
TOTAL BALANCE DUE	<u>\$ 64,505.00</u>

Stris & Maher LLP

Invoice # 14381

January 13, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
12/13/24	EB	Continue preparing portions of November fee statement.	1.40	1100.00	1,540.00
12/17/24	EB	Continue preparing portions of November fee statement.	.90	1100.00	990.00
12/19/24	EB	Continue preparing portions of November fee statement.	2.30	1100.00	2,530.00
12/20/24	VO	Work on fee application.	1.40	875.00	1,225.00
TOTAL PROFESSIONAL SERVICES					\$ 6,285.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	4.60	1,100.00	5,060.00
Victor O'Connell	VO	Partner	1.40	875.00	1,225.00
Total			6.00		\$ 6,285.00

TOTAL THIS INVOICE**\$ 6,285.00**

Stris & Maher LLP

Invoice # 14381

January 13, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00
14331	12/19/24	46,190.00	.00	46,190.00
Previous Balance				\$ 58,220.00
Balance Due This Invoice				<u>\$ 6,285.00</u>
TOTAL BALANCE DUE				<u><u>\$ 64,505.00</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ 46,190.00	\$ 2,597.00	\$ 9,433.00	\$.00	\$.00	\$ 58,220.00



February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14471
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Midas Green Litigation

Total Professional Services	\$ 21,615.00
Total Expenses Advanced	<u>\$ 3,765.00</u>
TOTAL THIS INVOICE	\$ 25,380.00
Previous Balance	<u>\$ 2,431.00</u>
TOTAL BALANCE DUE	<u>\$ 27,811.00</u>

Stris & Maher LLP

Invoice # 14471

February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/02/25	EB	Revise motion for entry of written summary judgment order and proposed order in support of same (1.1); correspond with BA regarding same (0.1).	1.20	1250.00	1,500.00
1/02/25	BA	Begin reviewing proposed filings seeking entry of judgment upon lifting of stay.	.30	1200.00	360.00
1/03/25	EB	Review materials in support of revisions to motion requesting written summary judgment order (0.5); correspond with BA, KH, PB, and SR regarding information in support of revisions to same and updated draft motion to lift stay from bankruptcy counsel (0.5); review and analyze related analysis and correspondence from BA and KH (0.3); revise and propose further revisions to both motions and accompanying proposed orders (1.9); correspond with bankruptcy and Texas counsel regarding same (0.1).	3.30	1250.00	4,125.00
1/03/25	BA	Review, analyze, and edit proposed filings seeking lifting of bankruptcy stay and entry of judgment upon lifting of stay, and correspond with EB and KH regarding same.	1.90	1200.00	2,280.00
1/03/25	ASA	Assist EB with analysis of named defendants in support of motion to lift stay.	.20	350.00	70.00
1/04/25	KJH	Research injunction waiver and review and provide related and additional comments on draft motion to lift stay.	2.90	1100.00	3,190.00
1/06/25	EB	Review and analyze proposed revisions from Texas counsel (0.1); correspond with Texas counsel regarding same (0.1).	.20	1250.00	250.00
1/07/25	EB	Review and analyze revisions proposed by Texas counsel to district court submission to prepare for upcoming discussion (0.2); attend teleconference with Texas counsel regarding same and corresponding bankruptcy court submission (0.4); correspond with Texas counsel regarding draft bankruptcy court submission and potential further revisions to same and district court submission (0.1); correspond with litigation fellows and Texas counsel regarding Midas Green bankruptcy proofs of claim (0.1); begin reviewing same and providing information to bankruptcy counsel in support of objections to same (0.5).	1.30	1250.00	1,625.00

Stris & Maher LLP

Invoice # 14471

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/07/25	ASA	Review and circulate Midas Green proof of claim for EB.	1.70	350.00	595.00
1/08/25	EB	Advise ASA and MN regarding compilation of documents requested by bankruptcy counsel (0.3); review and provide same (0.2); correspond with bankruptcy counsel (0.3) and Texas counsel (0.1) regarding status and supporting analysis.	.90	1250.00	1,125.00
1/08/25	ASA	Collect redacted documents from docket to assist preparation of Motion to Lift Stay in bankruptcy court in coordination with EB and MN.	.70	350.00	245.00
1/13/25	EB	Correspond with [REDACTED] regarding preservation notice and update Texas counsel regarding anticipated timing.	.10	1250.00	125.00
1/17/25	EB	Review objection status and deadline.	.10	1250.00	125.00
1/21/25	EB	Attend teleconference with [REDACTED] regarding request to lift stay to permit entry of summary judgment order and related action items (0.2); begin preparing description of invalidity and inequitable conduct claims (0.5).	.70	1250.00	875.00
1/22/25	EB	Review materials regarding status of claims and prepare draft invalidity and inequitable conduct claim description (0.8); correspond with BA, JS, and VO regarding same (0.2); correspond with [REDACTED] regarding reminder preservation notice (0.1).	1.10	1250.00	1,375.00
1/23/25	EB	Correspond with [REDACTED] regarding [REDACTED].	.20	1250.00	250.00
1/30/25	EB	Review and update Texas counsel regarding order lifting stay (0.1); draft meet and confer correspondence to opposing counsel (0.1); revise motion for entry of written summary judgment order (1.9); review and update client and co-counsel regarding correspondence from district court clerk and proposed response to same (0.2).	2.30	1250.00	2,875.00
1/31/25	EB	Evaluate response to correspondence from district court clerk (0.3); correspond with [REDACTED] and bankruptcy counsel regarding same (0.1); correspond with Texas counsel regarding correspondence to district court clerk regarding bankruptcy order (0.1).	.50	1250.00	625.00

TOTAL PROFESSIONAL SERVICES**\$ 21,615.00**

Stris & Maher LLP

Invoice # 14471

February 21, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	11.90	1,250.00	14,875.00
Bridget Asay	BA	Partner	2.20	1,200.00	2,640.00
Ken Halpern	KJH	Partner	2.90	1,100.00	3,190.00
Andrew Atsalis	ASA	Fellow	2.60	350.00	910.00
Total			19.60		\$ 21,615.00

EXPENSES ADVANCED

Date	Task	Description	Amount
12/31/24		JND Discovery Invoice for December 2024.	3,765.00
		TOTAL EXPENSES ADVANCED	\$ 3,765.00
		TOTAL THIS INVOICE	\$ 25,380.00

Stris & Maher LLP

Invoice # 14471

February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14251	11/01/24	855.00	684.00	171.00
14257	11/04/24	8,190.00	8,058.00	132.00
14283	11/14/24	4,755.00	4,557.00	198.00
14330	12/19/24	4,425.00	4,293.00	132.00
14380	1/13/25	8,990.00	7,192.00	1,798.00
Previous Balance				\$ 2,431.00
Balance Due This Invoice				<u>\$ 25,380.00</u>
TOTAL BALANCE DUE				<u><u>\$ 27,811.00</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 1,798.00	\$ 132.00	\$ 501.00	\$.00	\$ 2,431.00



February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14459
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Whinstone Litigation

Total Professional Services	\$ 634,762.50
Total Expenses Advanced	<u>\$ 205,268.47</u>

TOTAL THIS INVOICE	\$ 840,030.97
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Previous Balance	<u>\$ 721,359.00</u>
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TOTAL BALANCE DUE	<u>\$ 1,561,389.97</u>
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Trust Funds Remaining on Account	\$ 115,369.59
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Stris & Maher LLP

Invoice # 14459

February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/02/25	EB	Attention to case management.	.30	1250.00	375.00
1/02/25	JS	Assign and advise Stris team regarding high priority phase two and damages case research issues.	1.30	1025.00	1,332.50
1/02/25	HM	Continue conducting research for affirmative damages case.	4.60	700.00	3,220.00
1/03/25	VO	Confer with PS, EB, and JS regarding Phase 2 strategy and planning.	.90	1025.00	922.50
1/03/25	PS	Teleconference with EB, JS, and VO regarding phase two strategy and planning.	.90	1450.00	1,305.00
1/03/25	EB	Review update from HM regarding ██████████ research (0.2); attend teleconference with PS, VO, and JS regarding phase 2 strategy and planning (0.9); confer with BA and JS regarding expert-related action items in support of phase 2 and affirmative damages claim (0.8); correspond with PB, HM, MV and litigation fellows regarding text messages for TT analysis (0.1); prepare correspondence to TT regarding upcoming project in support of phase 2 trial preparation (0.1).	2.10	1250.00	2,625.00
1/03/25	BA	Confer with JS and EB regarding expert-related action items (0.8); correspond with ██████████ (0.1).	.90	1200.00	1,080.00
1/03/25	JS	Call with EB and BA regarding expert action items on phase two and damages case (0.8); call with EB, PS, and VO regarding phase two strategy and planning (0.9); evaluate high priority expert action items in relation to damages case and phase two (2.4).	4.10	1025.00	4,202.50
1/03/25	HM	Continue drafting damages-phase document review memorandum (0.7).	.70	700.00	490.00
1/04/25	EB	Prepare for (0.1) and attend (0.3) teleconference with BA and ██████████ regarding analysis in support of phase 2 ██████████ ██████████; confer with BA regarding resulting action items and other damages expert analysis for phase 2 (0.3).	.70	1250.00	875.00
1/04/25	BA	Prepare for meeting with ██████████ to discuss potential further analysis of ██████████ (0.3); participate in teleconference with ██████████ and EB to discuss same (0.3); confer with EB regarding expert-related action items (0.3).	.90	1200.00	1,080.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/05/25	BA	Review correspondence from expert [REDACTED] and correspond with [REDACTED] and JS and EB regarding next steps.	.20	1200.00	240.00
1/06/25	EB	Prepare for (0.1) and attend (0.4) teleconference with CS regarding [REDACTED] outline; attend teleconference with SR regarding action items in support of [REDACTED] analysis and phase 2 testimony (0.3).	.80	1250.00	1,000.00
1/06/25	JS	Correspond with client regarding status and next steps for phase two of assumption litigation (0.4); evaluate and advance expert and research action items for phase two and damages case (3.0).	3.40	1025.00	3,485.00
1/06/25	SR	Confer with EB regarding action items relating to [REDACTED] phase 2 and damages case.	.30	750.00	225.00
1/06/25	CS	Teleconference with EB to discuss [REDACTED] deposition outline (0.4); review and analyze [REDACTED] expert report (2.7).	3.10	850.00	2,635.00
1/06/25	HM	Continue drafting document review memorandum for damages and phase 2.	2.10	700.00	1,470.00
1/07/25	EB	Attend teleconference with BA, JS, and PB regarding damages claim and phase 2 document review memorandum and next steps in support of review (0.3); correspond with TT regarding action items in support of damages and phase 2 text message review (0.2)	.50	1250.00	625.00
1/07/25	BA	Correspond and confer with litigation team and P. Tomasco regarding lack of response from Whinstone's counsel regarding phase 2 and correspond with M. Thomas regarding same and intent to seek status conference (0.8); draft emergency motion for status conference, correspond with litigation team and P. Tomasco regarding edits to same and finalization of same, and correspond with B. Howell regarding finalization and filing of same (2.7); review response from M. Thomas regarding phase 2 and analysis of same from JS (0.2); attend meeting with EB, JS, and PB to discuss strategy for preparation for upcoming trial proceedings (0.3).	4.00	1200.00	4,800.00
1/07/25	JS	Attend meeting with BA, EB, and PB to discuss strategy for preparation for upcoming trial proceedings (0.3); review and evaluate memorandum regarding review for damages case (0.3); move forward high priority action items for phase 2 and damages case (3.3).	3.90	1025.00	3,997.50

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/07/25	SR	Begin reviewing materials to assist BA, EB, JS in [REDACTED] phase 2 and damages analysis.	6.10	750.00	4,575.00
1/07/25	CS	Review and analyze [REDACTED] reports in preparation for taking [REDACTED] deposition.	4.60	850.00	3,910.00
1/07/25	PB	Attend meeting with BA, EB, and JS to discuss strategy for preparation for upcoming trial proceedings.	.30	850.00	255.00
1/07/25	HM	Continue drafting damages-phase document review memorandum (2.2).	2.20	700.00	1,540.00
1/08/25	VO	Emails with client representatives and client's legal counsel regarding Whinstone objection to installation of miners (0.3); confer and correspond with JS and W. Thompson regarding same (1.1).	1.40	1025.00	1,435.00
1/08/25	EB	Review and correspond with BA, JS, PB, and HM regarding revisions to damages and phase 2 document review memorandum (0.7); prepare for (0.2) and attend (0.5) teleconference with TT regarding text message review and analysis in support of damages claim and phase 2; correspond with PB and HM regarding supporting action items (0.1).	1.50	1250.00	1,875.00
1/08/25	BA	Review correspondence between client and Whinstone regarding miner replacement and correspond with JS and litigation team regarding strategy for response to same (0.4); review draft review memorandum for damages phase and correspond with HM, EB, PB, and JS regarding strategy for and revisions to same (0.3); review draft notice of hearing and correspond with B. Howell regarding filing of same (0.1).	.80	1200.00	960.00
1/08/25	JS	Evaluate next steps and prepare correspondence and research regarding Whinstone refusal to cooperate with miner swap.	5.30	1025.00	5,432.50
1/08/25	SR	Continue reviewing materials to assist BA, EB, JS in [REDACTED] phase 2 and damages analysis.	6.50	750.00	4,875.00
1/08/25	CS	Continue reviewing and analyzing [REDACTED] reports and [REDACTED] report in preparation for [REDACTED] deposition.	6.30	850.00	5,355.00
1/08/25	PB	Review and revise draft memorandum regarding Phase 2 document analysis (1.2); teleconference with MV regarding Phase 2 preparation (0.2).	1.40	850.00	1,190.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/08/25	TT	Review materials including draft memorandum from HM to prepare for hot document assessment for damages and phase 2 (0.7); confer with EB regarding phase two litigation and affirmative damages in support of hot document assessment (0.5); prepare summary and analysis of [REDACTED] texts in support of same (6.0).	7.20	525.00	3,780.00
1/09/25	VO	Attend conference call with client representatives and client's legal counsel regarding miner installation dispute (0.8); emails with client and team regarding same (0.5).	1.30	1025.00	1,332.50
1/09/25	EB	Review initial summary and analysis from TT regarding text message review (0.5); advise TT regarding revisions to same (0.2); prepare for (0.4) and attend (1.0) teleconference with BA, JS, SR, and [REDACTED] regarding [REDACTED] in support of phase 2; review further information from [REDACTED] (0.1); correspond with BA, JS, and SR regarding same (0.1).	2.30	1250.00	2,875.00
1/09/25	BA	Correspond with litigation team and client regarding Whinstone's refusal to cooperate in replacement of miners and response to same (0.6); participate in teleconference with litigation team, bankruptcy counsel, and client team to address Whinstone's refusal to cooperate in replacement of miners (0.5); correspond further with J. Cohn, W. Thompson, and JS regarding email to Whinstone's counsel regarding same, correspond and confer with JS regarding same, and email Whinstone's counsel regarding same (0.5); begin drafting emergency motion seeking status conference to address Whinstone's refusal to cooperate in replacement of miners (2); participate in teleconference with [REDACTED], EB, SR, and JS to discuss analysis of [REDACTED] as relevant to phase 2 and to affirmative damages claim (1).	4.60	1200.00	5,520.00
1/09/25	JS	Prepare emergency motion regarding Whinstone actions in connection with miner swap (3.5); evaluate strategy and next steps in connection with same (3.4); attend teleconference with BA, SR, EB, and [REDACTED] regarding [REDACTED] in connection with phase 2 and damages (1.0).	7.90	1025.00	8,097.50
1/09/25	SR	Attend videoconference with [REDACTED], EB, BA, JS to discuss phase 2 and damages analysis (1); continue reviewing materials in connection with the same (5.5).	6.50	750.00	4,875.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/09/25	CS	Begin drafting outline for deposition of [REDACTED].	5.00	850.00	4,250.00
1/09/25	TT	Prepare summary and analysis of [REDACTED] texts in support of phase two litigation and affirmative damages hot document assessment (9.2)	9.20	525.00	4,830.00
1/10/25	VO	Emails with client and legal teams regarding new roadblocks from Whinstone regarding miner installation and Rhodium response to same (0.6); videoconference with client and legal teams regarding same (0.9).	1.50	1025.00	1,537.50
1/10/25	EB	Review and respond to team and client correspondence regarding status and high priority action items (0.1); attend teleconference with CS regarding [REDACTED] deposition [REDACTED] and [REDACTED] fact-gathering in support of same (0.1); attend teleconference with HM regarding discovery-related action items including revisions to review memorandum (0.1); begin reviewing and annotating materials in support of [REDACTED] damages and potential phase 2 analysis (1.0).	1.30	1250.00	1,625.00
1/10/25	BA	Correspond with [REDACTED] and P. Tomasco regarding deposition schedule (0.1); participate in teleconference with P. Tomasco, W. Thompson, J. Cohn, and JS to discuss preparation for status conference regarding phase 2 and issues related to miner replacement (1); participate in teleconference with A. Swartz, T. Disher, and [REDACTED] to discuss issues related to [REDACTED], correspond with litigation team regarding next steps with [REDACTED], and convey materials to A. Swartz related to same (0.6); correspond with litigation team and client team regarding Whinstone's refusal to cooperate with miner replacement and participate in teleconference with client team and litigation team regarding Whinstone's refusal to cooperate with miner replacement (1); correspond with JS and W. Thompson regarding Monday's status conference, review analysis of W. Thompson for same, correspond with JS, HM, and PB regarding analysis needed to prepare for same, and begin preparing for same (2).	4.70	1200.00	5,640.00
1/10/25	JS	Assist in preparation for status conference regarding phase 2 (5.3); attend teleconference with J. Cohn, W. Thompson, P. Tomasco, and BA regarding same (1.0).	6.30	1025.00	6,457.50
1/10/25	SR	Continue reviewing materials to assist BA, EB, JS in [REDACTED] phase 2 and damages analysis.	6.90	750.00	5,175.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/10/25	CS	Meet with EB to discuss progress on [REDACTED] deposition outline (0.1); review and analyze articles and papers [REDACTED] (1.0); continue drafting outline for [REDACTED] deposition (6.5).	7.60	850.00	6,460.00
1/10/25	PB	Draft analysis of invoices submitted by Whinstone in support of potential Phase 2 litigation.	1.20	850.00	1,020.00
1/10/25	HM	Continue drafting phase 2 and affirmative damages claim document review memorandum (4.4); teleconference with EB about document review memorandum (0.1); assist BA and JS with emergency status conference preparation (1.5).	6.00	700.00	4,200.00
1/10/25	TT	Continue preparing summary and analysis of [REDACTED] texts in support of phase two litigation and affirmative damages hot document assessment.	9.10	525.00	4,777.50
1/11/25	EB	Review correspondence and propose revised response to correspondence from Whinstone (0.1); correspond with JS regarding same (0.1); attend teleconferences with [REDACTED] (0.1) and [REDACTED] (0.2) regarding same and related action items; correspond with BA and JS regarding updating of document preservation notice (0.1).	.60	1250.00	750.00
1/11/25	BA	Prepare for hearing on scope of phase 2, including review of pleadings and evidence (2.9); review prior document hold letter and correspond with EB regarding [REDACTED] (0.1); correspond with P. Tomasco, W. Thompson, and JS regarding deposition dates (0.1).	3.10	1200.00	3,720.00
1/11/25	JS	Assist in preparation for status conference regarding Phase II issues.	2.20	1025.00	2,255.00
1/11/25	CS	Continue drafting outline for deposition of [REDACTED].	1.70	850.00	1,445.00
1/12/25	BA	Prepare for status conference, including research, outline and slide preparation, review of pleadings, and correspondence with JS and P. Tomasco (3.5); correspond with opposing counsel regarding deposition schedule (0.1).	3.60	1200.00	4,320.00
1/12/25	CS	Continue drafting outline for deposition of [REDACTED].	.90	850.00	765.00
1/12/25	PB	Draft analysis of invoices in preparation for status conference regarding Phase 2.	1.50	850.00	1,275.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/12/25	HM	Assist BA and JS with preparation for emergency status conference (0.4); continue drafting phase 2 and affirmative damages case document review memorandum (0.7).	1.10	700.00	770.00
1/12/25	TT	Continue preparing summary and analysis of [REDACTED] texts.	1.60	525.00	840.00
1/13/25	VO	Confer with JS and client legal counsel regarding [REDACTED] (0.2); emails with team and Rhodium regarding same (0.1); emails with JS and EB and confer with JS regarding analysis of [REDACTED] in connection with potential [REDACTED] (0.4).	.70	1025.00	717.50
1/13/25	EB	Correspond with [REDACTED], SR, and review and respond to team correspondence including TT, BA, JS, PB, and ASA regarding TT review of text messages (0.4); continue reviewing and annotating materials in support of [REDACTED], damages, and phase 2 analysis (1.5).	1.90	1250.00	2,375.00
1/13/25	BA	Prepare for and participate in status conference regarding scope of phase 2, including conferring with JS and corresponding with P. Tomasco regarding slide revisions (3.4); correspond with JS and team regarding follow up to status conference, and correspond with opposing counsel regarding same (0.2); correspond with JS and W. Thompson regarding proposed meet and confer, and correspond with [REDACTED], litigation team, and bankruptcy counsel regarding mediation [REDACTED] (0.2); review initial text message analysis and correspond with EB and JS regarding same (0.2).	4.00	1200.00	4,800.00
1/13/25	JS	Prepare for (0.3) and attend conference regarding phase II issues (0.5); confer with BA to prepare for same (0.5); evaluate and implement high priority action items in light of same (2.3); confer with CS regarding [REDACTED] deposition (0.2).	3.80	1025.00	3,895.00
1/13/25	CS	Listen to court hearing on need and subject of Phase II trial (0.7); meet with JS to discuss status of miner installation at Rockdale (0.2); review email communications related to the same (0.3); continue drafting outline for deposition of [REDACTED] (6.6).	7.80	850.00	6,630.00
1/13/25	PB	Attend hearing regarding schedule for trial phase two.	.50	850.00	425.00
1/13/25	HM	Continue drafting and revising phase 2 and affirmative damages case document review memorandum (1.5).	1.50	700.00	1,050.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/13/25	TT	Continue preparing summary and analysis of [REDACTED] texts.	8.50	525.00	4,462.50
1/14/25	EB	Review and respond to team correspondence and correspond with Stris team members regarding high priority action items (0.4); update TB regarding [REDACTED] analysis request in support of [REDACTED] (0.1); continue analyzing and annotating materials in support of [REDACTED] damages and phase analysis (1.2); attend teleconference with SR regarding same (0.2); review draft report from client (0.1); attend teleconference with clients, JS, co-counsel, and [REDACTED] regarding next steps in the wake of same (0.4); attend portion of checkpoint teleconference with BA, JS, clients and co-counsel (0.5).	2.90	1250.00	3,625.00
1/14/25	BA	Attend strategy call with litigation team, bankruptcy team, and client team (0.4); correspond with JS regarding [REDACTED] [REDACTED] issue raised by client (0.1); correspond with bankruptcy counsel regarding discovery information for [REDACTED] and correspond with PB regarding responses to same (0.3).	.80	1200.00	960.00
1/14/25	JS	Attend teleconferences regarding [REDACTED] (0.4) and weekly touchpoint (0.5); evaluate next steps for phase 2 and potential mediation in light of status conference (0.5).	1.40	1025.00	1,435.00
1/14/25	SR	Continue reviewing and analyzing material and begin drafting [REDACTED] in support of [REDACTED], damages, and expert analysis (4.3); attend teleconference with EB regarding the same (0.2).	4.50	750.00	3,375.00
1/14/25	TB	Call with EB to discuss contract question regarding [REDACTED].	.10	1200.00	120.00
1/14/25	CS	Continue drafting outline for [REDACTED] deposition.	5.30	850.00	4,505.00
1/14/25	NC	Schedule meeting for EB & SR; correspond with EB regarding same.	.10	350.00	35.00
1/14/25	PB	Revise analysis of produced invoices.	.30	850.00	255.00
1/14/25	HM	Revise phase 2 and affirmative damages case document review memorandum (1.5).	1.50	700.00	1,050.00
1/14/25	TT	Continue preparing summary and analysis of [REDACTED] texts.	8.30	525.00	4,357.50

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Date	Tkpr	Description	Hours	Rate	Amount
1/15/25	PS	Teleconference with EB regarding strategy (0.3); prepare for upcoming strategy team calls (1.9).	2.20	1450.00	3,190.00
1/15/25	EB	Continue analyzing and annotating information in support of [REDACTED] phase 2 and damages claims (3.0); correspond with Stris team members regarding status and phase 2 action items (0.5); attend teleconference with PS regarding high priority action items and matter strategy (0.3).	3.80	1250.00	4,750.00
1/15/25	BA	Correspond and confer with PB and JS regarding Whinstone/Riot invoices (0.4); prepare for meet and confer with opposing counsel, confer with JS regarding same, and participate in meet and confer with opposing counsel (0.8); correspond with PB regarding invoice analysis and review further analysis of unpaid invoices, and correspond with JS regarding strategy for addressing invoices disputes with court (0.4).	1.60	1200.00	1,920.00
1/15/25	JS	Confer with BA to prepare for meet and confer regarding mediation and phase 2 (0.2); attend meet and confer with opposing counsel and [REDACTED] regarding mediation and phase 2 (0.5); evaluate strategic next steps in connection with [REDACTED] issues (1.0); evaluate legal issues surrounding Whinstone invoice claims and [REDACTED] argument (2.5).	4.20	1025.00	4,305.00
1/15/25	SR	Continue reviewing and analyzing material and drafting notes in support of [REDACTED] claims, damages, and expert analysis.	8.60	750.00	6,450.00
1/15/25	CS	Continue drafting outline for deposition of [REDACTED]; review and analyze data and documents relevant to the same.	7.60	850.00	6,460.00
1/15/25	CHH	Review and circulate attachments to produced [REDACTED] messages for document review efforts.	.30	350.00	105.00
1/15/25	PB	Teleconference with BA and JS regarding invoice analysis (0.6); correspondence with BA and JS regarding same (0.5).	1.10	850.00	935.00
1/15/25	HM	Review and respond to team correspondence regarding phase 2 and affirmative damages case document review memorandum (0.2).	.20	700.00	140.00
1/15/25	TT	Continue preparing summary and analysis of [REDACTED] texts.	10.00	525.00	5,250.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/16/25	VO	Confer with PS, EB, and JS regarding litigation planning and strategy.	.80	1025.00	820.00
1/16/25	PS	Continue to prepare for (1.3) and attend (0.9) team meeting regarding high priority phase 2 and damages-related action items; attend further strategy teleconference with EB, JS, and VO (0.8).	3.00	1450.00	4,350.00
1/16/25	EB	Continue analyzing and annotating materials in support of [REDACTED] of phase 2 and damages claim (2.4); advise NC regarding memorandum in support of same (0.1); correspond with Stris team and co-counsel regarding high priority action items including response to client inquiry and potential correspondence to Whinstone (0.4); review update from and advise TT regarding next steps in support of text message analysis (0.1); prepare for (0.5), attend and lead (0.9) Stris team meeting regarding high priority phase 2 and damages-related action items, and attend further strategy teleconference with PS, JS, and VO (0.8).	5.20	1250.00	6,500.00
1/16/25	BA	Review and analyze invoice data to prepare for phase 2 and assist client with resolving disputed invoices, correspond with JS regarding same, correspond with A. Peloubet to seek additional information, and review further analysis from A. Peloubet (1.9); attend teleconference with PS, EB, JS, CS, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); begin outlining phase 2 scope arguments (0.5); correspond and confer with JS and W. Thompson regarding analysis of [REDACTED] to Whinstone for [REDACTED] (0.7); correspond with litigation team regarding client request for advice on [REDACTED] report (0.1).	3.70	1200.00	4,440.00
1/16/25	JS	Attend teleconference with PS, EB, BA, CS, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9); attend teleconference with VO, EB, and PS regarding strategic and high-priority Phase 2 action items (0.8).	1.70	1025.00	1,742.50
1/16/25	SR	Attend teleconference with PS, EB, BA, JS, CS, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9); continue reviewing and analyzing material and drafting notes in support of [REDACTED] claims, damages, and expert analysis (6.4).	7.40	750.00	5,550.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/16/25	TB	Conduct legal research and analysis regarding ██████ for EB and JS.	3.70	1200.00	4,440.00
1/16/25	CS	Participate in teleconference with PS, EB, JS, BA, CH, AA, and JHA regarding Phase 2 pressing action items (0.5); continue drafting outline for deposition of ██████ (4.7).	5.20	850.00	4,420.00
1/16/25	CHH	Prepare invoice document review set for Phase II (0.5); attend teleconference with PS, EB, BA, JS, CS, SR, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.9).	1.40	350.00	490.00
1/16/25	NC	Update ██████ memorandum with ██████ ██████.	.10	350.00	35.00
1/16/25	ASA	Attend teleconference with PS, EB, BA, JS, CS, SR, CHH, and JHA regarding strategic and high-priority Phase 2 action items.	.90	350.00	315.00
1/16/25	TT	Complete initial summary and analysis of ██████ texts (2.0); reprepare summary and analysis of ██████ texts in support of phase two and damages claims (8.9).	10.90	525.00	5,722.50
1/17/25	EB	Review update from TT and correspond with BA, JS, and ASA regarding additional text message analysis (0.2); attend teleconference with TT regarding next steps in support of same including review of embedded documents (0.4); continue analyzing and annotating materials in support of ██████ ██████ of phase 2 and damages claim (2.2); advise NC regarding revisions to memorandum regarding same (0.1).	2.90	1250.00	3,625.00
1/17/25	BA	Continue analyzing disputed payment amounts, correspond with JS and with litigation and client team regarding same, and participate in teleconference with P. Tomasco, JS, and J. Cohn regarding strategy for same (1.9); review Whinstone's filing on scope of phase 2 and correspondence regarding water payments, correspond with JS regarding same, and continue analyzing and outlining arguments for response to Whinstone's scope filing (2).	3.90	1200.00	4,680.00
1/17/25	JS	Review and evaluate Whinstone scope filing and prepare preliminary outline of response.	3.50	1025.00	3,587.50
1/17/25	SR	Continue reviewing and analyzing material and drafting notes in support of ██████ claims, damages, and expert analysis.	6.30	750.00	4,725.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/17/25	CS	Continue drafting outline for deposition of [REDACTED] (6.4); review and analyze Whinstone's statement on scope of phase 2 hearing (0.7).	7.10	850.00	6,035.00
1/17/25	NC	Prepare memorandum for EB regarding [REDACTED] phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	2.30	350.00	805.00
1/17/25	JH	Update bankruptcy docket.	2.00	350.00	700.00
1/17/25	TT	Conference call with EB regarding status and strategy going forward in support of phase two and affirmative damages hot document assessment (.4)	.40	525.00	210.00
1/17/25	TT	Revise summary and analysis of [REDACTED] texts to address additional information as directed by EB.	5.50	525.00	2,887.50
1/18/25	BA	Research and draft opposition to Whinstone's Phase 2 statement.	4.30	1200.00	5,160.00
1/18/25	SR	Continue reviewing and analyzing material and drafting notes in support of [REDACTED] claims, damages, and expert analysis.	6.50	750.00	4,875.00
1/18/25	TB	Continue [REDACTED] research.	3.10	1200.00	3,720.00
1/18/25	HM	Continue revising phase 2 and affirmative damages document review memorandum (1.4).	1.40	700.00	980.00
1/19/25	BA	Continue researching and drafting opposition to Whinstone's Phase 2 statement.	4.50	1200.00	5,400.00
1/19/25	TB	Continue [REDACTED] research and analysis regarding [REDACTED].	2.90	1200.00	3,480.00
1/19/25	HM	Revise phase 2 and affirmative damages case document review memorandum (3.8).	3.80	700.00	2,660.00
1/19/25	TT	Review and analyze embedded attachments from Rhodium texts regarding hot document assessment for phase two and affirmative damages.	8.60	525.00	4,515.00
1/20/25	EB	Revise phase 2 and damages document review memorandum (1.8); correspond with BA, JS, VO, PB, and HM regarding further revisions to and next steps in support of same and with TT regarding text review and analysis (0.5); continue annotating materials for [REDACTED] phase 2 and damages analysis (1.5).	3.80	1250.00	4,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/20/25	EB	Attend teleconference with CS [REDACTED] deposition regarding outline and preparation.	.20	1250.00	250.00
1/20/25	BA	Continue researching and drafting response to Whinstone's phase 2 scope filing and correspond and confer with JS regarding same (3.6); correspond with P. Tomasco and client team regarding payment disputes with Whinstone and phase 2 issues (0.3).	3.90	1200.00	4,680.00
1/20/25	JS	Prepare for and attend call with counsel and client teams regarding statement of scope (1.3); review and revise statement of scope (4.5); confer with BA regarding same (0.1).	5.90	1025.00	6,047.50
1/20/25	CS	Call with EB to discuss status of [REDACTED] deposition outline (0.2); continue drafting outline for deposition of [REDACTED] (7.2)	7.40	850.00	6,290.00
1/20/25	PB	Teleconference with BA and JS regarding brief on scope of Phase 2.	1.00	850.00	850.00
1/20/25	HM	Revise phase 2 and affirmative damages review memorandum (0.7).	.70	700.00	490.00
1/20/25	TT	Continue reviewing and analyzing embedded attachments as requested by EB.	5.60	525.00	2,940.00
1/21/25	EB	Correspond with Stris team regarding high priority action items including final revisions to phase 2 review memorandum (0.2); attend teleconference with BA, JS, PB, and HM regarding action items including same (0.8); prepare for (0.2) and attend (0.3) teleconference with [REDACTED] regarding action items including [REDACTED] notice; continue annotating materials for [REDACTED] phase 2 and damages memorandum (1.5); review draft memorandum and advise NC regarding revisions to same (0.3); attend portion of checkpoint teleconference with clients and co-counsel (0.5).	3.80	1250.00	4,750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/21/25	BA	Continue researching and drafting response to Whinstone's Phase 2 statement, correspond with litigation team and with JS, HM, and PB regarding strategy for same, and review and incorporate revisions from bankruptcy counsel for same (4.2); participate in teleconference with bankruptcy counsel, client, and litigation team (.5); review draft document review memorandum for affirmative damages phase, convey edits on some to EB and HM, and participate in teleconference with EB, HM, JS, and PB to discuss revisions to same and finalize tagging decisions (0.8).	5.50	1200.00	6,600.00
1/21/25	JS	Assist in preparation of Statement of Scope (2.4); attend portion of weekly touch-point call with client and outside counsel teams (0.5); attend teleconference with BA, EB, HM, and PB regarding damages phase document review memorandum (0.8).	3.70	1025.00	3,792.50
1/21/25	SR	Continue reviewing and analyzing material and drafting notes in support of [REDACTED] claims, damages, and expert analysis.	3.50	750.00	2,625.00
1/21/25	TB	Continue [REDACTED] research and analysis.	3.80	1200.00	4,560.00
1/21/25	CS	Continue drafting outline for deposition of [REDACTED].	8.10	850.00	6,885.00
1/21/25	CHH	Review BA email and collect documents for Phase II preparations accordingly (0.3); review and analyze Quinn Emanuel [REDACTED] request (0.2); confer with PB regarding same (0.1); work on same (4.0).	4.60	350.00	1,610.00
1/21/25	NC	Continue preparing memorandum for EB regarding [REDACTED] [REDACTED] phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	1.50	350.00	525.00
1/21/25	JH	Update bankruptcy docket (0.5); review materials from HM to prepare for phase 2 and damages case document review (1.0).	1.50	350.00	525.00
1/21/25	PB	Teleconference with BA, JS, EB, and HM regarding strategy for Phase 2 preparation and follow-up call with HM regarding same (1.0); call with BA regarding brief on scope of Phase 2 (0.3); call with CH regarding response to SAFE request (0.2).	1.50	850.00	1,275.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/21/25	HM	Teleconference with EB, PB, JS, and BA regarding phase 2 and affirmative damages document review memorandum (0.8); confer with PB about document review management (0.2); revise phase 2 and affirmative damages document review memorandum (3.3); assist BA with upcoming filing on scope of phase 2 (0.4).	4.70	700.00	3,290.00
1/21/25	TT	Continue reviewing and analyzing embedded attachments.	6.90	525.00	3,622.50
1/22/25	EB	Revise and advise CS regarding revisions to [REDACTED] deposition outline (3.5); correspond with BA, JS, and NC regarding [REDACTED] notice (0.1); attend teleconference with PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); correspond with [REDACTED] regarding [REDACTED] notice (0.2); attention to case management (0.3); review and respond to team correspondence regarding high priority action items including response to [REDACTED] inquiries (0.5).	5.60	1250.00	7,000.00
1/22/25	BA	Continue researching, reviewing, and drafting response to Whinstone's phase 2 statement, correspond with litigation and bankruptcy counsel regarding revisions to same, correspond and confer with PS and JS regarding invoice analysis and related strategy for same, review and revise supporting materials and declaration for same, and correspond with JS, PB, HM, SB, and CH and B. Howell as necessary regarding finalization and filing of same (5.2); correspond with [REDACTED] and P. Tomasco regarding [REDACTED], correspond with EB regarding client request for assistance with [REDACTED], and correspond with JS and EB regarding updating [REDACTED] notice (0.2); correspond with CH and with bankruptcy counsel regarding document search requests from SAFE holders (0.2); correspond with EB and VO regarding request from [REDACTED] for expert reports and correspond with EB regarding Midas Green counterclaim description for bankruptcy schedules (0.2).	5.80	1200.00	6,960.00
1/22/25	JS	Assist in finalizing Statement of Scope.	3.00	1025.00	3,075.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/22/25	SB	Attend teleconference with EB, PB, HM, TT, ASA, CHH and JHA regarding phase 2 document review instructions (1.0); create Asay declaration iso Debtors' scope statement (1.8); create exhibits iso Debtors' scope statement (1.0).	3.80	350.00	1,330.00
1/22/25	CS	Continue drafting outline for deposition of [REDACTED].	6.10	850.00	5,185.00
1/22/25	CHH	Prepare discovery database for phase 2 document review (0.1); attend teleconference with EB, PB, HM, TT, ASA, JHA, and SB regarding phase 2 document review instructions (1.0); teleconference with [REDACTED] regarding proximity searching (0.3); continue running search term reports for Quinn (3.5); [REDACTED] issues with same in email memorandum to BA and JS (0.1); cite-check and proofread Debtors' response and counter-statement on the scope of phase 2 (3.2).	8.20	350.00	2,870.00
1/22/25	NC	Continue preparing memorandum for EB regarding [REDACTED] [REDACTED] phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	1.20	350.00	420.00
1/22/25	JH	Attend teleconference with EB, PB, HM, TT, ASA, CHH and SB regarding phase 2 document review instructions (1.0); review first assigned batch of documents for Phase 2 issues (6.0).	7.00	350.00	2,450.00
1/22/25	PB	Attend teleconference with EB, HM, TT, ASA, CHH, JHA, and SB regarding Phase 2 document review instructions (1.0); prepare analysis to support brief regarding Phase 2 scope (2.2); teleconferences with BA and JS regarding same (0.8); call with CH regarding response to discovery requests (0.1).	4.10	850.00	3,485.00
1/22/25	ASA	Attend teleconference with EB, PB, HM, TT, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); review and analyze materials from HM to prepare for phase 2 document review (1.0); begin Phase 2 document review (0.7).	2.70	350.00	945.00
1/22/25	HM	Attend teleconference with EB, PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0); assist BA with scope filing (1.0); perform tasks related to document review, including [REDACTED] batch completion and drafting correspondence to reviewers (0.6).	2.60	700.00	1,820.00
1/22/25	TT	Attend teleconference with EB, PB, HM, TT, ASA, CHH, JHA, and SB regarding phase 2 document review instructions (1.0).	1.00	525.00	525.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/22/25	TT	Continue reviewing and analyzing embedded text attachments.	7.80	525.00	4,095.00
1/23/25	PS	Prepare for (1.0) and attend (1.1) teleconference with EB, BA, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	2.10	1450.00	3,045.00
1/23/25	EB	Confer with BA regarding action items including response to credits analysis inquiry (0.2); correspond with P. Tomasco and R. Izakelian regarding same (0.3); review and advise NC regarding revisions to ██████████ memorandum (0.2); continue reviewing and annotating materials in support of same (2.5); attend initial daily checkpoint phase 2 document review teleconference to assess progress, address questions, and advise regarding revisions to review memoranda and protocol (0.2); prepare for (0.5) and attend (1.1) teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority phase 2 action items; review comments and questions from CS (0.2) and attend teleconference with CS regarding revisions to ██████████ deposition outline (0.3); provide materials to CS in support of same (0.1); correspond with co-counsel and ██████████ regarding ██████████ and TB regarding review and analysis of materials in support of mediation (0.2).	5.80	1250.00	7,250.00
1/23/25	BA	Attend teleconference with PS, EB, JS, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1); correspond with JS regarding upcoming status conference on Phase 2 scope, correspond with P. Tomasco regarding same, and begin preparing for argument at same (1.2); review updates from CH regarding issues with Logikcull searches requested by bankruptcy counsel (0.2).	2.40	1200.00	2,880.00
1/23/25	JS	Attend teleconference with PS, EB, BA, CS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); review and evaluate strategic questions posed by ██████████ in connection with Phase 2 and damages case strategy (0.7); confer with ██████████ regarding same (0.1).	1.90	1025.00	1,947.50
1/23/25	SR	Attend portion of teleconference with PS, EB, BA, JS, CS, PB, HM, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.00	750.00	750.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/23/25	SB	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); attend daily checkpoint teleconference regarding phase 2 document review. (0.2); conduct Phase 2 document review (3.7).	5.00	350.00	1,750.00
1/23/25	CS	Meet with EB regarding status of outline for deposition of [REDACTED] (0.3); attend teleconference with PS, EB, BA, JS, PB, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); continue drafting outline for deposition of [REDACTED] (5.8)	7.20	850.00	6,120.00
1/23/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); prepare discovery database for same (0.1); attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); collect and prepare background documents regarding [REDACTED] for team to review (0.3); confer with [REDACTED] regarding proximity searching issues (0.1); test run various searches with proposed solution to same (0.2); email memorandum to BA regarding same (0.1); review and analyze materials from HM to prepare for phase 2 document review (1.0); review first assigned phase 2 document review batch (1.5).	4.60	350.00	1,610.00
1/23/25	NC	Continue preparing memorandum for EB regarding [REDACTED] of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	1.80	350.00	630.00
1/23/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review second assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
1/23/25	PB	Attend teleconference with PS, EB, BA, JS, CS, HM, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.10	850.00	935.00
1/23/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); circulate requested deposition transcript at request of EB (0.2); review assigned batch of Phase 2 documents (3.0); attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, MV, SB, JHA, and CHH regarding strategic and high-priority Phase 2 action items (1.1).	4.50	350.00	1,575.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/23/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); attend teleconference with PS, EB, BA, JS, CS, PB, SR, CHH, MV, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items (1.1); perform quality check of document review (0.5); draft phase 2 task list (0.3).	2.10	700.00	1,470.00
1/23/25	TT	Review and analyze revised memorandum from HM and Order of U.S. Bankruptcy Court in preparation for phase 2 and affirmative damages review.	1.20	525.00	630.00
1/23/25	MV	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	1.10	425.00	467.50
1/24/25	EB	Provide further feedback to CS regarding revisions to [REDACTED] deposition outline (0.5); review and respond to team and co-counsel correspondence regarding high priority action items (0.5); review and comment on draft complaint (2.0); continue annotating [REDACTED] phase 1 materials in support of phase 2 and damages claims (1.1).	4.10	1250.00	5,125.00
1/24/25	BA	Prepare for status conference/hearing on scope of phase 2, including conferring with P. Tomasco, W. Thompson, J. Cohn, and JS (4.3); participate in status conference/hearing on scope of phase 2 (1); confer with [REDACTED] and [REDACTED] following hearing (0.2); confer with JS regarding follow up from hearing (0.1); correspond with litigation and bankruptcy counsel regarding ongoing issues with [REDACTED] (0.1).	5.60	1200.00	6,720.00
1/24/25	JS	Attend portion of teleconference with outside counsel teams to prepare for hearing on scope of Phase 2 (0.6); attend teleconferences with BA to prepare for (0.8) and debrief from (0.1) hearing on scope of Phase 2; attend hearing on Phase 2 (0.9); begin reviewing and evaluating damages complaint (1.0).	3.40	1025.00	3,485.00
1/24/25	TB	Update [REDACTED] research and analysis based on review of additional [REDACTED] materials.	4.50	1200.00	5,400.00
1/24/25	CS	Continue drafting outline for deposition of [REDACTED] (6.1); review hearing on phase two trial issues (1).	7.10	850.00	6,035.00

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Date	Tkpr	Description	Hours	Rate	Amount
1/24/25	CHH	Review first assigned phase 2 document review batch (1.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review second assigned phase 2 document review batch (2.0); review third assigned phase 2 document review batch (0.5).	4.30	350.00	1,505.00
1/24/25	NC	Continue preparing memorandum for EB regarding [REDACTED] of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	5.30	350.00	1,855.00
1/24/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review third assigned batch of documents for Phase 2 issues (6.0).	6.30	350.00	2,205.00
1/24/25	PB	Attend daily team meeting regarding document preparation for Phase 2 hearing (0.3); attend portion of hearing regarding scope of Phase 2 (0.5).	.80	850.00	680.00
1/24/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update running matter status memorandum (0.2); review assigned batch of Phase 2 documents (5.0)	5.50	350.00	1,925.00
1/24/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding phase 2 document review (0.6).	.90	700.00	630.00
1/24/25	SD	Prepare and organize documents for BA's hearing in U.S. Bankruptcy Court, Southern Dist. of Texas (0.9).	.90	350.00	315.00
1/25/25	BA	Review correspondence from W. Thompson regarding miner installations and correspond with [REDACTED] regarding same (0.1); begin reviewing draft affirmative complaint (0.9).	1.00	1200.00	1,200.00
1/25/25	JS	Review and evaluate draft damages phase complaint.	1.50	1025.00	1,537.50
1/25/25	TB	Continue updating [REDACTED] analysis based upon additional [REDACTED] litigation documents.	1.20	1200.00	1,440.00
1/25/25	CS	Continue drafting outline for deposition of [REDACTED].	2.00	850.00	1,700.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/26/25	EB	Continue reviewing and commenting on draft complaint including responding to comments from BA (0.6); continue reviewing and annotating materials in support of [REDACTED] phase 2 and damages claims (2.0); correspond with NC regarding next steps in support of memorandum regarding same (0.1).	2.70	1250.00	3,375.00
1/26/25	BA	Correspond with EB and JS regarding draft complaint and review additional comments from EB on same.	.20	1200.00	240.00
1/26/25	JS	Further review and revise draft damages phase complaint.	1.00	1025.00	1,025.00
1/26/25	CS	Continue revising outline for deposition of [REDACTED].	3.10	850.00	2,635.00
1/27/25	EB	Correspond with BA, JS, HM, MV, and litigation assistants regarding high priority action items in support of phase 2 (0.5); continue reviewing and annotating [REDACTED] phase 1 materials (3.0); review and begin further revising revised [REDACTED] deposition outline from CS (2.1); review update from and advise TT regarding next steps in support of text analysis (0.3); confer with and provide documents to A. Swartz in support of revisions to draft complaint (0.3).	6.20	1250.00	7,750.00
1/27/25	BA	Correspond with JS and EB regarding high priority action items for both phase 2 and affirmative case, correspond with HM regarding text message storage by Setec, and review client update regarding miner installation (0.4).	.40	1200.00	480.00
1/27/25	JS	Attend teleconferences with [REDACTED] and [REDACTED] (1.3); further review damages phase complaint (0.5); evaluate high priority action items in connection with Phase 2 and damages case (1.1).	2.90	1025.00	2,972.50
1/27/25	SR	Continue reviewing and analyzing material and drafting notes in support of [REDACTED] claims, damages, and expert analysis.	1.00	750.00	750.00
1/27/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.1); conduct Phase 2 document review (2.9).	3.00	350.00	1,050.00
1/27/25	NC	Continue preparing memorandum for EB regarding [REDACTED] of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	1.50	350.00	525.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/27/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review fourth assigned batch of documents for Phase 2 issues (4.0).	4.20	350.00	1,470.00
1/27/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review assigned batch of Phase 2 documents (3.8).	4.00	350.00	1,400.00
1/27/25	HM	Perform quality check of phase 2 document review (0.1); update document review memorandum (0.3); attend daily checkpoint teleconference regarding phase 2 document review (0.1); confer with ██████████ Setec regarding storage of cell phone images (0.3); draft correspondence to BA, JS, and PB regarding storage of cell phone images (0.3).	1.10	700.00	770.00
1/27/25	TT	Revise summary and analysis of ██████████ texts to address additional information as directed by EB.	5.10	525.00	2,677.50
1/27/25	MV	Assist with syntax and search parameters for phase 2 review (0.8); begin preparing phase 2 exhibits and exhibit list (1.2); create targeted searches and provide results for attorney review (0.5).	2.50	425.00	1,062.50
1/28/25	EB	Correspond with NC regarding ██████████ memorandum (0.1); continue annotating materials for same (1.9); prepare for (0.6) and attend (1.0) teleconference with BA, JS, and SR regarding action items in support of ██████████ analysis; review and respond to team correspondence and correspondence with co-counsel regarding high priority action items including revisions to draft complaint (0.4); correspond with ██████████ regarding analysis and action items (0.1); prepare for (0.2) and attend portion of (1.1) teleconference with clients and co-counsel.	5.40	1250.00	6,750.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/28/25	BA	Review, research, and analyze proposed slides for financing process as related to damages claims, correspond with JS and EB regarding same, and correspond with litigation team and client team regarding same (0.8); participate in teleconference with SR, JS, and EB to analyze and strategize for work of [REDACTED] expert [REDACTED] (1); review and analyze revised draft of amended complaint, correspond with litigation team regarding same, and research issues for same (0.8); participate in teleconference with client team, litigation team, and bankruptcy counsel (1.1); review revisions to draft affirmative complaint and convey edits on same to JS and EB (0.4); analyze research on [REDACTED] issues as relevant to [REDACTED] complaint (0.3).	4.40	1200.00	5,280.00
1/28/25	JS	Attend client touch point call (0.7); attend portion of teleconference with SR, EB, and BA regarding [REDACTED] issues in connection with damages phase (0.5); evaluate [REDACTED] slides in connection with [REDACTED] issues (0.6); review and evaluate revised complaint (0.5).	2.30	1025.00	2,357.50
1/28/25	SR	Continue reviewing and analyzing material and drafting notes in support of [REDACTED] claims, damages, and expert analysis (4.8); attend teleconference with EB, BA, and JS to discuss action items and strategy relating to the same (1); review and analyze damages-related calculations to assist EB, JS, and BA in preparation for client call regarding the same (1.7).	7.40	750.00	5,550.00
1/28/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.1); conduct Phase 2 document review (3.9).	4.00	350.00	1,400.00
1/28/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); teleconference with MV regarding various targeted searches in support of phase 2 discovery (0.3); generate same (0.1); review and analyze documents regarding [REDACTED] issue (0.7); email memorandum to EB regarding same (0.1); review third assigned phase 2 document review batch (1.0).	2.40	350.00	840.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/28/25	NC	Continue preparing memorandum for EB regarding ██████████ of phase 1 materials and related questions and action items in support of ██████████ phase 2 and damages claims.	1.70	350.00	595.00
1/28/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review fifth assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
1/28/25	ASA	Assist EB with access to spreadsheets provided by ██████████ (0.3); update ██████████ memorandum (0.2); attend daily checkpoint teleconference regarding phase 2 document review (0.2); continue review of Phase 2 documents ██████████ (2.8).	3.50	350.00	1,225.00
1/28/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); perform quality check of phase 2 document review (0.9); correspond with EB about progress of document review (0.5).	1.60	700.00	1,120.00
1/28/25	TT	Continue revising summary and analysis of ██████████ texts(2.1); revise summary and analysis of ██████████ (0.8) and ██████████ (2.5) texts in support of phase 2 litigation and affirmative damages claims.	5.40	525.00	2,835.00
1/28/25	MV	Attend teleconference with CH regarding search parameters and syntax set-up for phase 2 targeted searches (0.3); review documents from targeted document searches, create and revise additional searches, and update HM and team regarding same (1.9).	2.20	425.00	935.00
1/29/25	EB	Review revised slide deck and draft complaint to assist with further revisions (1.4); attend teleconference with JS and co-counsel regarding revisions to and action items in support of latter (0.6); review additional materials from ██████████ in support of same and to prepare for upcoming teleconference (0.2); attend teleconference with BA, SR, and ██████████ regarding related analysis (1.0); correspond with BA, JS, and SR regarding resulting action items (0.1).	3.30	1250.00	4,125.00
1/29/25	BA	Participate in teleconference with ██████████, EB, and SR to discuss action items and analysis related to damages calculations.	1.00	1200.00	1,200.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/29/25	JS	Attend teleconference with EB and co-counsel regarding revisions and action items in connection with slide deck draft (0.6); review and revise same and draft complaint (0.9); evaluate motion to [REDACTED] and related issues (1.5)	3.00	1025.00	3,075.00
1/29/25	SR	Attend videoconference with [REDACTED], EB, BA to discuss [REDACTED] and damages-related expert analysis (1); review and analyze correspondence from [REDACTED] regarding the same (1); continue analyzing material and drafting notes in support of [REDACTED], damages, and expert analysis (5.5).	7.50	750.00	5,625.00
1/29/25	SB	Attend portion of daily checkpoint teleconference regarding phase 2 document review. (0.2); conduct Phase 2 document review (4.0).	4.20	350.00	1,470.00
1/29/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); targeted searching and review and analysis of documents for same (0.5); emails to EB and HM regarding same (0.1); review fourth assigned phase 2 document review batch (2.5); review fifth assigned phase 2 document review batch (1.4).	4.80	350.00	1,680.00
1/29/25	NC	Continue preparing memorandum for EB regarding [REDACTED] of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	1.60	350.00	560.00
1/29/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.5); review sixth assigned batch of documents for Phase 2 issues (4.0).	4.80	350.00	1,680.00
1/29/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); continue review of assigned Phase 2 documents [REDACTED] (3.4); update [REDACTED] memorandum at request of EB (0.3).	4.00	350.00	1,400.00
1/29/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update document review memorandum (0.2); review and respond to team correspondence regarding document review (1.5); attention to organization of internal matter files (0.5).	2.50	700.00	1,750.00
1/29/25	TT	Continue analyzing embedded attachments.	1.70	525.00	892.50

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/29/25	MV	Assist with further targeted searches for attorney review.	2.50	425.00	1,062.50
1/30/25	PS	Prepare for (0.5) and attend (0.3) team teleconference regarding high priority action items.	.80	1450.00	1,160.00
1/30/25	EB	Continue analyzing and corresponding with BA, JS, SR, C. [REDACTED] and co-counsel regarding information in support of [REDACTED] analysis (1.5); attend portion of Stris team teleconference regarding high priority action items (0.2); attend teleconference with JS, client, and co-counsel regarding [REDACTED] expert (0.5).	2.20	1250.00	2,750.00
1/30/25	BA	Continue reviewing and analyzing adversary complaint, including edits and comments on same from client team and bankruptcy team, and correspond with A. Swartz and team regarding same (1.7); participate in teleconference with litigation team, bankruptcy counsel, and client team regarding [REDACTED] to Whinstone (0.6); attend teleconference with PB, HM, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); confer with EB regarding proposed [REDACTED] expert [REDACTED] (0.1); confer with JS regarding case status and correspond with J. Cohn and team regarding water bill invoices (0.2); continue analyzing research on issues related to [REDACTED] for damages claims (0.3).	3.20	1200.00	3,840.00
1/30/25	JS	Further review and evaluate complaint in connection with water issues (1.1); attend client call regarding [REDACTED] issues (0.6); attend call with [REDACTED] regarding Whinstone litigation issues (1.1).	2.80	1025.00	2,870.00
1/30/25	SB	Conduct Phase 2 document review (3.2).	3.20	350.00	1,120.00
1/30/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review fifth assigned phase 2 document review batch (1.0); review sixth assigned phase 2 review batch (2.0); review seventh assigned phase 2 review batch (2.0); attend teleconference with BA, PB, HM, PS, EB, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3).	5.60	350.00	1,960.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/30/25	NC	Continue preparing memorandum for EB regarding [REDACTED] of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	2.20	350.00	770.00
1/30/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.1); review seventh assigned batch of documents for Phase 2 issues (4.0).	4.40	350.00	1,540.00
1/30/25	PB	Attend teleconference with BA, PB, HM, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items.	.30	850.00	255.00
1/30/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); attend teleconference with BA, PB, HM, PS, EB, CHH, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); provide ShareFile link for [REDACTED] and download updated spreadsheet (0.1); update [REDACTED] memorandum (0.2); continue review of assigned Phase 2 documents (5.1).	6.00	350.00	2,100.00
1/30/25	HM	Attend teleconference with BA, PB, PS, EB, CHH, ASA, and JHA to discuss strategic and high-priority Phase 2 action items (0.3); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding task list and document review (0.7).	1.30	700.00	910.00
1/30/25	MV	Attend teleconference with PS, EB, BA, JS, CS, PB, HM, SR, CHH, SB, JHA, and ASA regarding strategic and high-priority Phase 2 action items.	.30	425.00	127.50
1/31/25	EB	Correspond with BA, HM, MV, TT, and CH regarding status and action items in support of document review, qc, and exhibit list (0.5); correspond with JS and co-counsel regarding material and action items in support of revisions to draft complaint (0.6); advise NC regarding next steps in support of memorandum (0.1); revise [REDACTED] deposition outline (1.7).	2.90	1250.00	3,625.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/31/25	BA	Review and analyze new NDA agreement required by Whinstone for employees, correspond with CH to request document comparison, correspond with client regarding same, and correspond with J. Cohn, W. Thompson, P. Tomasco, and JS regarding analysis of same and [REDACTED] (1.8); participate in teleconference with client team, P. Tomasco, and A. Swartz regarding [REDACTED] consultant (0.5); correspond with P. Tomasco and litigation team regarding next steps for [REDACTED] consultant, and potential further production of documents for [REDACTED] (0.3); correspond with J. Cohn and JS regarding water invoices, request history of same from [REDACTED], and review same as relevant to phase 2, and correspond with HM, MV, and CH regarding use of same as phase 2 exhibits (0.5); review correspondence from [REDACTED] regarding potential mediation and correspond with P. Tomasco and team regarding same (0.2); correspond with HM, EB, and CH regarding document review updates and potential phase 2 exhibits (0.2); correspond with HM regarding [REDACTED] data storage (0.1); review Whinstone's reply regarding scope of phase 2 and correspond with P. Tomasco regarding potential response to same (0.4).	3.90	1200.00	4,680.00
1/31/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review eighth assigned phase 2 document review batch (2.0); review ninth assigned phase 2 review batch (2.0); targeted searching and analysis of [REDACTED] issues (0.5).	4.70	350.00	1,645.00
1/31/25	NC	Continue preparing memorandum for EB regarding [REDACTED] of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	6.10	350.00	2,135.00
1/31/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); update bankruptcy docket (0.2); review eighth assigned batch of documents for Phase 2 issues (5.0).	5.50	350.00	1,925.00
1/31/25	ASA	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); continue review of assigned Phase 2 documents (5.0).	5.30	350.00	1,855.00

Stris & Maher LLP

Invoice # 14459

February 21, 2025

Date	Tkpr	Description	Hours	Rate	Amount
1/31/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); confer with TT regarding phase 2 document review (1.1); perform quality check of document review (1.2); amend review memorandum (0.5); review and respond to team correspondence regarding document review and other targeted document searches (1.6).	4.70	700.00	3,290.00
1/31/25	TT	Review and analyze additional materials in support of phase 2 document review (0.4); confer with HM regarding phase 2 document review (1.1).	1.50	525.00	787.50
1/31/25	MV	Continue working on Phase 2 exhibits and exhibit list.	1.00	425.00	425.00
TOTAL PROFESSIONAL SERVICES					\$ 634,762.50

Stris & Maher LLP

Invoice # 14459

February 21, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	9.00	1,450.00	13,050.00
Elizabeth Brannen	EB	Partner	72.80	1,250.00	91,000.00
Bridget Asay	BA	Partner	82.90	1,200.00	99,480.00
Tillman Breckenridge	TB	Partner	19.30	1,200.00	23,160.00
Victor O'Connell	VO	Partner	6.60	1,025.00	6,765.00
John Stokes	JS	Partner	80.40	1,025.00	82,410.00
Colleen Smith	CS	Associate	103.20	850.00	87,720.00
Peter Brody	PB	Associate	15.10	850.00	12,835.00
Sarah Rahimi	SR	Associate	80.00	750.00	60,000.00
Helen Marsh	HM	Associate	47.30	700.00	33,110.00
Tanya Tice	TT	Discovery Associate	115.50	525.00	60,637.50
Monica Viramontes	MV	Sr Paralegal	9.60	425.00	4,080.00
Andrew Atsalis	ASA	Fellow	36.40	350.00	12,740.00
Cynthia Huang	CHH	Fellow	40.90	350.00	14,315.00
Sebastian Delgado	SD	Fellow	.90	350.00	315.00
Shayra Banta	SB	Fellow	23.20	350.00	8,120.00
Nicholas Capalbo	NC	Fellow	25.40	350.00	8,890.00
Jaida Hodge-Adams	JH	Fellow	46.10	350.00	16,135.00
Total			814.60		\$ 634,762.50

Stris & Maher LLP

Invoice # 14459

February 21, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
11/30/24		Printing for the Rhodium trial in Houston.	6,687.77
12/05/24		Local Travel - The Lancaster Hotel - lodging for Houston Depositions.	30,919.21
12/19/24		Local Travel - Vendor fee for research documents.	116.49
12/27/24		Local Travel - Newswire press release service fee.	349.00
12/31/24		Litigation Support Vendors	2,550.00
1/01/25		Logikcull EDiscovery SaaS subscription.	2,646.00
2/11/25		Stone turn - Balance of professional services rendered.	162,000.00
TOTAL EXPENSES ADVANCED			\$ 205,268.47
TOTAL THIS INVOICE			\$ 840,030.97

Stris & Maher LLP

Invoice # 14459

February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14249	11/01/24	79,868.00	63,894.40	15,973.60
14263	11/04/24	1,139,238.00	918,737.10	220,500.90
14269	11/14/24	1,632,686.25	1,329,529.25	303,157.00
14317	12/19/24	1,183,151.62	1,022,299.12	160,852.50
14366	1/13/25	132,202.25	111,327.25	20,875.00
Previous Balance				\$ 721,359.00
Balance Due This Invoice				<u>\$ 840,030.97</u>
TOTAL BALANCE DUE				<u>\$ 1,561,389.97</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 20,875.00	\$ 160,852.50	\$ 539,631.50	\$.00	\$ 721,359.00



February 21, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14472
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through January 31, 2025

RE: Retention and Fee Applications

Total Professional Services	\$ 8,575.00
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 8,575.00
 Previous Balance	 <u>\$ 22,525.00</u>
TOTAL BALANCE DUE	<u><u>\$ 31,100.00</u></u>

Stris & Maher LLP

Invoice # 14472

February 21, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
1/09/25	EB	Begin working on December fee statement.	1.40	1250.00	1,750.00
1/10/25	EB	Continue working on December fee statement.	2.60	1250.00	3,250.00
1/10/25	NC	Assist EB with portions of December fee statement.	1.80	350.00	630.00
1/13/25	EB	Continue preparing portions of December fee statement.	1.00	1250.00	1,250.00
1/14/25	EB	Correspond with NC regarding (0.1) and continue preparing portions of December fee statement (0.6).	.70	1250.00	875.00
1/20/25	VO	Work on December fee application.	.80	1025.00	820.00

TOTAL PROFESSIONAL SERVICES**\$ 8,575.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	5.70	1,250.00	7,125.00
Victor O'Connell	VO	Partner	.80	1,025.00	820.00
Nicholas Capalbo	NC	Fellow	1.80	350.00	630.00
Total			8.30		\$ 8,575.00

TOTAL THIS INVOICE**\$ 8,575.00**

Stris & Maher LLP

Invoice # 14472

February 21, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14261	11/04/24	47,165.00	37,732.00	9,433.00
14284	11/14/24	12,985.00	10,388.00	2,597.00
14331	12/19/24	46,190.00	36,952.00	9,238.00
14381	1/13/25	6,285.00	5,028.00	1,257.00
Previous Balance				\$ 22,525.00
Balance Due This Invoice				<u>\$ 8,575.00</u>
TOTAL BALANCE DUE				<u>\$ 31,100.00</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 1,257.00	\$ 9,238.00	\$ 12,030.00	\$.00	\$ 22,525.00



March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14498
Client # 00346
Matter # 001

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: **Midas Green Litigation**

Total Professional Services	\$ 15,240.00
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 15,240.00
Previous Balance	<u>\$ 27,178.00</u>
TOTAL BALANCE DUE	<u>\$ 42,418.00</u>

Stris & Maher LLP

Invoice # 14498

March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	EB	Prepare and correspond with Texas counsel regarding notice of order modifying stay.	.50	1250.00	625.00
2/04/25	EB	Correspond with opposing counsel regarding joint submission (0.1); review and begin analyzing draft of same (0.1); correspond with KH, PB, and SR regarding corrections in support of same (0.1).	.30	1250.00	375.00
2/04/25	KJH	Review Midas Green's draft proposed order memorializing the Court's rulings on pretrial motions, motion hearing transcript, and motions, and correspond with EB regarding defects in proposed order.	1.70	1100.00	1,870.00
2/05/25	EB	Revise draft orders on pretrial motions received from opposing counsel (2.6); correspond with KH, BA, co-counsel, and [REDACTED] regarding proposed revisions to and next steps in support of same (0.1).	2.70	1250.00	3,375.00
2/05/25	KJH	Review draft edits to Midas's proposed order on summary judgment and Dauberts and correspond with EB regarding same.	.60	1100.00	660.00
2/06/25	EB	Correspond with KH and co-counsel regarding revisions to proposed orders (0.2); implement same (0.2); correspond with opposing counsel and confer with [REDACTED] regarding same (0.1); review and propose revisions to objection to Midas bankruptcy claims (2.9).	3.40	1250.00	4,250.00
2/06/25	KJH	Correspond with EB regarding proposed revisions to draft order on dispositive motions.	.20	1100.00	220.00
2/07/25	EB	Revise proposed orders to incorporate feedback from R. Harrington (0.5); correspond and confer with KH and opposing counsel regarding further revisions to and finalization of same (0.5).	1.00	1250.00	1,250.00
2/07/25	KJH	Review redline to draft proposed order on dispositive motions and correspond with BA, EB, and opposing counsel J. Thomas regarding same (0.5); attend teleconferences with opposing counsel H. Pogorzelski regarding revisions to draft proposed order and Midas proposal to extend time for submission (0.4).	.90	1100.00	990.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	EB	Update R. Harrington regarding submission and status.	.10	1250.00	125.00
2/14/25	EB	Correspond with counsel for third party regarding initial response to inquiry.	.10	1250.00	125.00
2/21/25	EB	Correspond with counsel for GRC regarding confidentiality inquiry.	.10	1250.00	125.00
2/24/25	EB	Update [REDACTED] regarding status (0.1); correspond with Texas counsel and counsel for GRC regarding same and confidentiality request, respectively (0.1).	.20	1250.00	250.00
2/25/25	EB	Correspond with counsel for GRC regarding teleconference to discuss confidentiality inquiry.	.10	1250.00	125.00
2/26/25	EB	Attend teleconference with counsel for GRC (0.4); review correspondence from counsel for GRC providing applicable protective order (0.1) update [REDACTED] regarding same and potential next steps (0.1).	.60	1250.00	750.00
2/27/25	EB	Communicate with Texas counsel regarding status and steps in support of request for district court ruling.	.10	1250.00	125.00

TOTAL PROFESSIONAL SERVICES**\$ 15,240.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	9.20	1,250.00	11,500.00
Ken Halpern	KJH	Partner	3.40	1,100.00	3,740.00
Total			12.60		\$ 15,240.00

TOTAL THIS INVOICE**\$ 15,240.00**

Stris & Maher LLP

Invoice # 14498

March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14380	1/13/25	8,990.00	7,192.00	1,798.00
14471	2/21/25	25,380.00	.00	25,380.00
Previous Balance				\$ 27,178.00
Balance Due This Invoice				<u>\$ 15,240.00</u>
TOTAL BALANCE DUE				<u><u>\$ 42,418.00</u></u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 25,380.00	\$ 1,798.00	\$.00	\$.00	\$ 27,178.00



March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14486
Client # 00346
Matter # 004

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Whinstone Litigation

Total Professional Services	\$ 736,447.50
Total Expenses Advanced	<u>\$ 18,425.62</u>
TOTAL THIS INVOICE	\$ 754,873.12
Previous Balance	<u>\$ 860,905.97</u>
TOTAL BALANCE DUE	<u>\$ 1,615,779.09</u>

Trust Funds Remaining on Account \$ 115,369.59

Stris & Maher LLP

Invoice # 14486

March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/01/25	BA	Continue reviewing new draft waiver/NDA from Whinstone, draft proposed [REDACTED] regarding same, and convey same to JS, W. Thompson, J. Cohn, and P. Tomasco (0.6); confer with JS and W. Thompson, regarding [REDACTED], proposed mediation, and other high priority action items (0.7); review W. Thompson's [REDACTED] email regarding [REDACTED], revise same, and convey same to client (0.2).	1.50	1200.00	1,800.00
2/01/25	JS	Confer with BA and W. Thompson regarding high priority action items (0.7); confer with VO and correspond with client and co-counsel regarding mediation planning (0.3).	1.00	1025.00	1,025.00
2/02/25	JS	Review and evaluate complaint and Building D contract claims (2.9); attend teleconference with [REDACTED] regarding litigation status and next steps (0.5).	3.40	1025.00	3,485.00
2/02/25	TT	Review documents as instructed by HM to help prepare for phase 2 litigation and affirmative damages claim.	2.60	525.00	1,365.00
2/03/25	EB	Correspond with HM and NC regarding action items including document review and MV regarding phase 2 exhibit list (0.2); attention to case management (0.5); continue annotating [REDACTED] phase 1 materials (1.8); advise CS regarding additional information and material in support of [REDACTED] deposition (0.1); review and analyze proposed form of consulting agreement (0.3); correspond with BA, JS, VO, co-counsel and [REDACTED] regarding same (0.2).	3.10	1250.00	3,875.00

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	BA	Correspond with HM and PB regarding cell phone data storage, update client and legal team regarding same, and correspond with custodians' counsel regarding same (0.3); correspond with legal team and with opposing counsel regarding mediation (0.1); correspond with bankruptcy counsel regarding SAFE group's discovery requests, confer with bankruptcy counsel and PB regarding same and confer further with PB regarding next steps (0.3); review projections document from bankruptcy counsel, correspond with bankruptcy counsel and with PB, JS, and HM regarding steps for production of same (0.3); review draft consulting agreement for client and correspond with EB regarding same (0.2); research and draft reply memorandum regarding phase 2 scope and convey same to J. Cohn, P. Tomasco, W. Thompson, and JS for review (4).	5.20	1200.00	6,240.00
2/03/25	JS	Evaluate high priority action items in connection with Phase 2 and damages claims.	1.30	1025.00	1,332.50
2/03/25	CS	Review and analyze documents relevant to [REDACTED] deposition; continue revising outline for [REDACTED] deposition.	4.10	850.00	3,485.00
2/03/25	CHH	Targeted searching for BA regarding water issues for phase 2 (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3); review tenth assigned phase 2 document review batch (2.0); review eleventh assigned phase 2 document review batch (2.0); begin reviewing twelfth assigned phase 2 document review batch (0.5); targeted searching for CS regarding [REDACTED] for phase 2 (0.5).	5.80	350.00	2,030.00
2/03/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	2.00	350.00	700.00
2/03/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review ninth assigned batch of documents for Phase 2 issues (4.5).	4.80	350.00	1,680.00
2/03/25	PB	Prepare to lead (0.1) and attend (0.3) daily checkpoint teleconference regarding phase 2 and damages document review; attend teleconference with B. Asay and R. Izakelian regarding document production (0.3).	.40	850.00	340.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/03/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence and questions from document reviewers regarding phase 2 document review (2.3); draft guidance for reviewers and update review memorandum (0.6).	3.20	700.00	2,240.00
2/03/25	TT	Review documents as instructed by HM to prepare for phase 2 litigation (8.3); attend daily checkpoint teleconference regarding phase 2 document review (0.3).	8.60	525.00	4,515.00
2/03/25	MV	Organize, prepare, and update internal exhibit list to reflect, Whinstone water invoices as instructed by counsel.	.70	425.00	297.50
2/04/25	EB	Confer with BA and JS regarding high priority action items (0.5); correspond with HM, MV, and NC regarding action items in support of document review and phase 2 exhibit list (0.2); continue analyzing and correspond with BA, JS, and co-counsel regarding [REDACTED] information in support of damages complaint (0.5); attend teleconference with client and co-counsel (1.5)	2.70	1250.00	3,375.00
2/04/25	BA	Review edits to phase 2 scope reply from J. Cohn and W. Thompson, correspond with JS regarding same, convey revised draft to client for review, correspond with JH regarding cite check of same and review cite check changes, and convey final draft to P. Tomasco and B. Howell for filing (1.5); confer with JS and EB regarding high priority action items including upcoming mediation, damages claims, and phase 2 preparation (0.5); review GMO filings regarding [REDACTED] and correspond with PB and litigation team regarding witness transcripts in GMO matter (0.2); correspond with EB, MV, PB and team regarding phase 2 exhibits (0.1); correspond with A. Swartz, P. Tomasco and team regarding [REDACTED] expert (0.1); participate in teleconference with client team, bankruptcy counsel, and litigation counsel to discuss high priority action items, including damages complaint and mediation preparation (1.5).	3.90	1200.00	4,680.00
2/04/25	JS	Attend call with BA and EB regarding high priority action items for phase 2 and damage case (0.5); attend client weekly touch point call (1.0); further review and evaluate issues with damages complaint (1.1).	2.60	1025.00	2,665.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/04/25	CS	Continue reviewing documents relevant to [REDACTED] deposition (2.5).	2.50	850.00	2,125.00
2/04/25	CHH	Targeted searching for CS regarding [REDACTED] for phase 2 (0.5); daily checkpoint teleconference regarding phase 2 document review (0.3); review twelfth assigned phase 2 document review batch (1.5); begin reviewing thirteenth assigned phase 2 document review batch (0.5); review Quinn document request and begin working on same (0.5).	3.30	350.00	1,155.00
2/04/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	2.00	350.00	700.00
2/04/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review eighth assigned batch of documents for Phase 2 issues (5.5).	5.80	350.00	2,030.00
2/04/25	PB	Attend daily review team status check-in.	.30	850.00	255.00
2/04/25	HM	Review and respond to team correspondence regarding document 2 review (1.1); perform quality check of documents reviewed (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.3).	1.90	700.00	1,330.00
2/04/25	TT	Attend part of daily checkpoint teleconference regarding phase 2 document review (0.2); Review documents for HM to prepare for phase 2 litigation (9.5).	9.70	525.00	5,092.50
2/04/25	MV	Create and revise various Logikcull searches for target documents for attorneys (2.0); assess court requirements for supplemental exhibit list for Phase 2 (0.7); continue revisions to internal exhibit list and locate, organize, and save potential exhibits (2.5).	5.20	425.00	2,210.00
2/05/25	EB	Attend teleconference with J. Cohn regarding [REDACTED] analysis in support of complaint (0.4); correspond and confer with Stris team and [REDACTED] regarding additional materials and analysis in support of same (0.5); review updates and review and respond to correspondence with HM, MV, and litigation fellows regarding document review and exhibit list (0.2); prepare to depose [REDACTED] (2.5).	3.60	1250.00	4,500.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/05/25	BA	Review comments from client team and bankruptcy counsel on draft affirmative complaint, correspond with EB and JS regarding same, and convey edits and comments on same to A. Swartz, W. Thompson, and J. Cohn (1.2); correspond with MV and CH regarding potential exhibits for phase 2 (.1); review correspondence from EB, [REDACTED] and team regarding potential further analysis by [REDACTED] regarding buildings C and D, as relevant to damages claims (0.1).	1.40	1200.00	1,680.00
2/05/25	JS	Further work on draft damages complaint and potential Phase 2 issues.	1.60	1025.00	1,640.00
2/05/25	SR	Review and analyze [REDACTED] report, [REDACTED] report and materials relied upon in connection with [REDACTED] inquiries regarding materials needed for additional analysis.	2.50	750.00	1,875.00
2/05/25	CS	Continue reviewing documents for [REDACTED] deposition and revising deposition outline (1.1)	1.10	850.00	935.00
2/05/25	CHH	Daily checkpoint teleconference regarding phase 2 document review (0.2); review thirteenth assigned phase 2 document review batch (1.5); review fourteenth assigned phase 2 document review batch (2.0); continue working on Quinn document request (0.5).	4.20	350.00	1,470.00
2/05/25	NC	Correspond with EB and HM regarding support for Phase 2 document review (0.2); continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims (1.7).	1.90	350.00	665.00
2/05/25	JH	Attend portion of daily checkpoint teleconference regarding phase 2 document review (0.2); review tenth assigned batch of documents for Phase 2 issues (3.5).	3.70	350.00	1,295.00
2/05/25	PB	Attend daily review team meeting regarding Phase 2 preparation (0.2); prepare transfer of data to co-counsel (0.2); call with CH regarding same (0.1).	.50	850.00	425.00
2/05/25	ASA	Continue review of Phase 2 documents produced by Whinstone and tag with relevant issue tags (4.0); gather relevant expert report material to assist SR with review of [REDACTED] data sources (0.1).	4.10	350.00	1,435.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/05/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review and respond to team correspondence regarding phase 2 document review (0.4); review documents for phase 2 (5.0).	6.00	700.00	4,200.00
2/05/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); continue reviewing documents assigned by HM (7.7).	7.90	525.00	4,147.50
2/05/25	MV	Conduct targeted searching for additional exhibits requested by attorneys (1.5); further update internal exhibit list with current potential exhibits and revise in preparation for phase 2 trial (2.0); further revise and add additional documents to deposition list (0.5).	4.00	425.00	1,700.00
2/06/25	EB	Prepare for and lead Stris team meeting regarding high priority action items (0.6); begin reviewing revised draft complaint (0.5).	1.10	1250.00	1,375.00
2/06/25	SR	Continue reviewing and analyzing ████████ report, ██████ report and materials relied upon in connection with ██████ ██████ inquiries regarding materials needed for additional analysis (2.6); correspond with PB, EB, and ██████ regarding the same (0.3); attend teleconference with EB, PB, HM, MV, JHA, CHH, and ASA regarding collection of relevant ████████ documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	3.40	750.00	2,550.00
2/06/25	CS	Continue reviewing documents relevant to ████████ deposition; continue revising outline for ████████ deposition (2.1).	2.10	850.00	1,785.00
2/06/25	CHH	Daily checkpoint teleconference regarding phase 2 document review (0.3); review fifteenth assigned phase 2 document review batch (2.0); review sixteenth assigned phase 2 document review batch (2.0); attend teleconference with EB, PB, SR, HM, MV, JHA, and ASA regarding collection of relevant ████████ documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	4.80	350.00	1,680.00
2/06/25	NC	Review first assigned phase 2 document review batch.	2.00	350.00	700.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/06/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); re-organize filed exhibits by ECF number at MV request for ease of attorney access (2.0); attend teleconference with EB, PB, SR, HM, MV, JHA, CHH, and ASA regarding collection of relevant [REDACTED] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	2.70	350.00	945.00
2/06/25	PB	Attend daily review team meeting regarding Phase 2 issues (0.3); attend portion of teleconference with EB, SR, HM, MV, JHA, CHH, and ASA regarding collection of relevant [REDACTED] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.4).	.70	850.00	595.00
2/06/25	ASA	Daily checkpoint teleconference regarding phase 2 document review (0.3); attend teleconference with EB, PB, SR, HM, MV, JHA, and CHH regarding collection of relevant [REDACTED] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5); continue Phase 2 review of documents produced by Whinstone and tag with relevant issue tags (5.1); analyze expert reports of [REDACTED] and [REDACTED] for sources of specific power data as requested by EB (1.1).	7.00	350.00	2,450.00
2/06/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review and respond to team correspondence regarding phase 2 document review (1.5); perform quality check of phase 2 document review (1.0); update phase 2 document review memorandum (0.7); attend teleconference with EB, PB, SR, MV, JHA, CHH, and ASA regarding collection of relevant [REDACTED] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	4.00	700.00	2,800.00
2/06/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.3); review documents assigned by HM to support phase 2 litigation (10.5).	10.80	525.00	5,670.00

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/06/25	MV	Continue updating internal exhibit list to add potential exhibits and verify status of exhibits admitted in phase 1 (3.0); attend teleconference with EB, PB, SR, HM, JHA, CHH, and ASA regarding collection of relevant [REDACTED] documents, status of ongoing document review, and preparation of Phase 2 exhibit list (0.5).	3.50	425.00	1,487.50
2/07/25	EB	Attend portion of teleconference with client and co-counsel regarding information and next steps in support of finalization of complaint (1.1); attention to regarding action items in light of order setting phase 2 hearing date (0.5).	1.60	1250.00	2,000.00
2/07/25	BA	Participate in teleconference with [REDACTED], bankruptcy counsel and litigation team regarding affirmative complaint (0.4); participate in teleconference with client team, bankruptcy counsel, and litigation team regarding affirmative complaint and mediation (1.2); confer with JS regarding affirmative complaint and phase 2 proceedings, review phase 2 scheduling order and correspond with client and litigation team to update regarding same, and confer with [REDACTED] regarding same (0.4).	2.00	1200.00	2,400.00
2/07/25	JS	Attend teleconferences regarding inclusion of certain claims in damages complaint (1.3) and further review and evaluate damages complaint (0.7).	2.00	1025.00	2,050.00
2/07/25	CS	Continue reviewing documents relevant to and revising [REDACTED] deposition outline.	4.60	850.00	3,910.00
2/07/25	CHH	Confer with PB regarding Quinn Emanuel document request (0.2); daily checkpoint teleconference regarding phase 2 document review (0.6); review seventeenth assigned phase 2 document review batch (2.0); review eighteenth assigned phase 2 document review batch (1.9); review nineteenth assigned phase 2 document review batch (2.0).	6.70	350.00	2,345.00
2/07/25	NC	Daily checkpoint teleconference regarding phase 2 document review (0.6); review second assigned phase 2 document review batch (3.0);	3.60	350.00	1,260.00
2/07/25	JH	Attend part of daily checkpoint teleconference regarding phase 2 document review (0.2); review eleventh assigned batch of documents for Phase 2 issues (3.0).	3.20	350.00	1,120.00
2/07/25	PB	Attend teleconference with CHH regarding production.	.20	850.00	170.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/07/25	ASA	Continue Phase 2 review of documents produced by Whinstone and tag with relevant issue tags.	8.00	350.00	2,800.00
2/07/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); review and respond to team correspondence regarding phase 2 document review (1.5); review documents for phase 2 (5.0).	7.10	700.00	4,970.00
2/07/25	TT	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); review documents for HM to prepare for phase 2 litigation (6.8).	7.40	525.00	3,885.00
2/08/25	EB	Analyze and correspond with BA, JS, and co-counsel regarding further revisions to draft complaint (1.6); review update from client and co-counsel and correspond with BA regarding next steps in support of same (0.1).	1.70	1250.00	2,125.00
2/08/25	BA	Review revised draft complaint and correspond with A. Swartz and J. Cohn regarding same (0.4); review correspondence regarding draft complaint and timing of filing and correspond and confer with JS regarding same (0.3).	.70	1200.00	840.00
2/08/25	JS	Evaluate potential inclusion of certain claims in damages complaint.	1.20	1025.00	1,230.00
2/08/25	HM	Review documents for phase 2 (2.5); review and response to document reviewer team correspondence regarding phase 2 document review (0.5).	3.00	700.00	2,100.00
2/08/25	TT	Review documents as assigned by HM to support upcoming phases of trial and claims.	4.20	525.00	2,205.00
2/09/25	EB	Review and respond to team correspondence regarding phase 2 document review and expert depositions.	.10	1250.00	125.00
2/09/25	BA	Review further correspondence regarding filing of affirmative complaint, review additional client comments on same and correspond with A. Swartz regarding edits to and attachments to same.	.30	1200.00	360.00
2/09/25	JS	Further evaluate potential inclusion of certain claims in damages complaint.	.80	1025.00	820.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/09/25	CHH	Review twentieth assigned phase 2 document review batch (0.8); review twenty-first assigned phase 2 document review batch (0.8); review twenty-second assigned phase 2 document review batch (0.8); review twenty-third assigned phase 2 document review batch (0.8).	3.20	350.00	1,120.00
2/09/25	TT	Continue reviewing assigned documents.	1.50	525.00	787.50
2/10/25	VO	Correspond with client and team regarding damages analysis in advance of mediation.	.40	1025.00	410.00
2/10/25	EB	Continue preparing for [REDACTED] expert deposition (2.7); correspond with CS regarding next steps in support of same (0.1); correspond with Stris Team and W. Thompson regarding and continue assisting with additional analysis and document searching in support of damages complaint (0.4); advise TB regarding adequate assurance research and analysis TB (0.2); attend teleconference with PB, SR, and [REDACTED] regarding additional documentation and analysis in support of [REDACTED] damages (0.3); attend to high priority phase 2 action items resulting from scope order including staffing, witness preparation planning, document and transcript review, and exhibit list updates and revisions (3.0).	6.70	1250.00	8,375.00
2/10/25	BA	Review second interim order addressing scope of phase 2 (0.3); prepare for phase 2 hearing, including reviewing evidence and potential exhibits, approving new production, and corresponding and conferring with bankruptcy and litigation team regarding strategy, potential briefing, depositions, and witnesses (2.5); review email from T. Schmeltz regarding special committee and correspond with JS regarding same (0.2).	3.00	1200.00	3,600.00
2/10/25	JS	Begin preparing plan for witnesses, exhibits, and briefing for Phase 2 in light of ruling from court.	6.30	1025.00	6,457.50
2/10/25	SR	Attend videoconference with EB, PB, and [REDACTED] regarding materials needed for additional analysis.	.30	750.00	225.00
2/10/25	TB	Call with E. Brannen regarding question on assumption of contracts; research regarding assumption of contracts in bankruptcy and review of sources (3.6).	3.80	1200.00	4,560.00

Stris & Maher LLP

Invoice # 14486

March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	CS	Review and analyze court order regarding phase two of the motion to assume (0.6); begin reviewing damages complaint and review and respond to email communications regarding the same (1.5); review and analyze documents relevant to Winter Storm Uri energy credits(2.2); continue analyzing ██████████ deposition outline (0.7).	5.00	850.00	4,250.00
2/10/25	CHH	Review twenty-fourth assigned phase 2 document review batch (0.7); review twenty-fifth assigned phase 2 document review batch (0.7); review twenty-sixth assigned phase 2 document review batch (0.7); targeted searching regarding Winter Storm Uri settlement and summarize results from same to EB (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.2); review twenty-seventh assigned phase 2 document review batch (0.7); review twenty-eighth assigned phase 2 document review batch (0.7); review twenty-ninth assigned phase 2 document review batch (0.7); perform quality control checks regarding phase 2 review batches (0.1); prepare and finalize debtors' production set 19 (0.2).	5.10	350.00	1,785.00
2/10/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of ██████████ phase 2 and damages claims.	1.80	350.00	630.00
2/10/25	JH	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review twelfth assigned batch of documents for Phase 2 issues (5.0).	5.20	350.00	1,820.00
2/10/25	PB	Attend daily review team check in regarding Phase 2 preparation (0.2); preparation for Phase 2 trial (3.1); teleconference with EB, SR, and potential expert (0.3).	3.60	850.00	3,060.00
2/10/25	ASA	Review documents produced by Whinstone and apply Phase 2 issue tags (3.6); collect ██████████ and exhibits at request of EB in support of ██████████ project (0.5); attend daily checkpoint teleconference regarding phase 2 document review (0.2); conduct targeted search for specific Whinstone invoices billed to client (0.6); review Phase 2 documents flagged during quality control and assign appropriate tags (1.2).	6.10	350.00	2,135.00

Stris & Maher LLP

Invoice # 14486

March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	HM	Attend daily checkpoint teleconference regarding phase 2 document review (0.2); review and respond to team correspondence regarding phase 2 document review (1.0); review documents for phase 2 (1.1).	2.30	700.00	1,610.00
2/10/25	TT	Attend daily checkpoint teleconference regarding phase 2 litigation (.2); review documents for HM to prepare for phase 2 litigation (4.7); review [REDACTED] for EB in support of fraud claim in phase 2 (3.5).	8.40	525.00	4,410.00
2/10/25	MV	Perform additional targeted searches for email as requested by attorneys (0.5); revise further, review hits, and update team (0.5).	1.00	425.00	425.00
2/11/25	VO	Confer with JS regarding settlement dynamics and strategy (0.7); emails with client and team regarding same (0.4).	1.10	1025.00	1,127.50
2/11/25	EB	Continue preparing to depose [REDACTED] expert (2.3); confer with CS, ASA, and JHA regarding preparation of exhibits for same and pretrial motions (0.2); attend teleconference with PB, HM, TT, CHH, JHA, and ASA to advise regarding high-priority Phase 2 action items (0.5); assist with final review and correspond with Stris team and co-counsel regarding finalization of damages complaint and accompanying documents and advise Stris team members regarding additional document searching and analysis in support of same (2.0); attend portion of checkpoint teleconference with BA, JS, clients, and co-counsel (1.2).	6.20	1250.00	7,750.00
2/11/25	BA	Participate in teleconference with client team and litigation team to discuss mediation and phase 2 preparation (1.2); confer with CS regarding phase 2 motion in limine, correspond with JS and litigation team regarding phase 2 preparation and meet and confer with opposing counsel, and correspond with opposing counsel regarding depositions and conferral (0.3).	1.50	1200.00	1,800.00
2/11/25	JS	Continue planning for witnesses, exhibits, depositions, and briefing for Phase 2 in light of court order (6.0) and attend portion of client touchpoint call (1.3).	7.30	1025.00	7,482.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/11/25	TB	Research regarding bankruptcy law requirements for establishing adequate assurance and when that is necessary; call with J. Stokes regarding specific parameters of adequate assurance issue.	6.80	1200.00	8,160.00
2/11/25	CS	Attend teleconference with EB, JHA, and ASA to discuss tasks in support of the deposition of Whinstone's expert ██████████ (0.2); meet with BA to discuss motion in limine to file in advance of Phase 2 hearing on motion to assume (0.2); beginning reviewing filings and background materials in preparation for drafting motion in limine (3.8); continue reviewing and analyzing damages complaint (0.8).	5.00	850.00	4,250.00
2/11/25	CHH	Attend teleconference with EB, PB, HM, TT, JHA, and ASA regarding high-priority Phase 2 action items (0.5); assist EB with targeted searching regarding ancillary invoices (0.5).	1.00	350.00	350.00
2/11/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of ██████████ phase 2 and damages claims.	1.90	350.00	665.00
2/11/25	JH	Attend teleconference with EB, CS, JHA, and ASA to discuss tasks in support of the deposition of Whinstone's expert ██████████ (0.2); attend teleconference with EB, PB, HM, TT, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); assist MV, EB and A. Swartz (LKC) in verifying the confidentiality of given filings in support of Rhodium's damages complaint (2.0).	2.90	350.00	1,015.00
2/11/25	PB	Prepare for Phase 2 trial.	4.30	850.00	3,655.00
2/11/25	ASA	Finish review of Phase 2 documents produced by Whinstone flagged during quality control and assign appropriate tags (2.5); attend teleconference with EB, PB, HM, TT, JHA, and CHH regarding high-priority Phase 2 action items (0.5); attend teleconference with EB, CS, and JHA to discuss tasks in support of the deposition of Whinstone's expert ██████████ (0.2); assist with review of orders issued by the arbitrator and Phase 1 trial exhibits in support of preparing damages complaint exhibits (1.5).	4.70	350.00	1,645.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/11/25	HM	Attend teleconference with EB, PB, TT, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); review and analyze hot documents for potential use in Phase 2 hearing and affirmative damages case (2.4).	2.90	700.00	2,030.00
2/11/25	TT	Attend teleconference with EB, PB, HM, CHH, JHA, and ASA regarding high-priority Phase 2 action items (0.5); analyze related materials and summarize ██████ testimony of ██████ in preparation for phase 2 (8.5); review and Analyze additional ██████ in preparation for phase 2 (2.0).	11.00	525.00	5,775.00
2/11/25	MV	Create and revise Logikcull various target searches for documents, review hits, correspondence regarding the same (2.0); correspondence with paralegal regarding filing of Phase 2 exhibits and exhibit list, review current documents (0.2); search of previously filed exhibit list and confirm exhibits filed under seal, correspondence regarding the same (0.8).	3.00	425.00	1,275.00
2/12/25	VO	Prepare for mediation (0.8); review emails from client regarding same (0.2); confer with JS regarding same (0.3).	1.30	1025.00	1,332.50
2/12/25	EB	Continue working on and advising Stris team regarding high priority action items in support of phase 2 and damages claim including exhibit list and document searching and analysis (5.3); review and respond to correspondence from ██████ and update PS, BA, and JS regarding same (0.1).	5.40	1250.00	6,750.00
2/12/25	BA	Continue preparing for mediation and phase 2 of the hearing, including reviewing analyses of outstanding invoices, reviewing potential exhibits, conferring with JS, PB, HM, and EB regarding strategy and preparation, conferring with A. Peloubet regarding status of invoices and hearing preparation, and correspond with P. Tomasco and team regarding hearing date and attempts to confer with opposing counsel.	1.80	1200.00	2,160.00
2/12/25	JS	Prepare for mediation (2.3) and for Phase 2 of assumption litigation (3.5).	5.80	1025.00	5,945.00
2/12/25	SR	Review energy consumption data in connection with ██████ request and correspond with ██████ regarding the same.	1.50	750.00	1,125.00
2/12/25	TB	Review case law regarding adequate assurance and write results of research.	3.60	1200.00	4,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/12/25	CS	Begin drafting motion in limine regarding ancillary services charges; review and analyze case law relevant to the same (5.4).	5.40	850.00	4,590.00
2/12/25	CHH	Email HM regarding phase 2 document review (0.1); assist EB with targeted searching in support of phase 2 (1.0).	1.10	350.00	385.00
2/12/25	PB	Preparation for trial Phase 2.	7.50	850.00	6,375.00
2/12/25	ASA	Gather relevant Court orders and recently filed damages complaint and send to Rhodium expert [REDACTED] (0.6); update internal memorandum to reflect recent case activity (0.7); compile and organize invoices requested by PB to assist with attorney review (0.2); research [REDACTED] information requested by EB in support of deposition preparation (2.7).	4.20	350.00	1,470.00
2/12/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	6.10	700.00	4,270.00
2/12/25	TT	Analyze and summarize materials for EB regarding Building D.	8.80	525.00	4,620.00
2/12/25	MV	Conduct further targeted searches for hot documents as requested by attorneys.	2.00	425.00	850.00
2/13/25	VO	Attend zoom meeting with team regarding phase 2 trial planning and mediation planning (1.5); emails with team regarding mediation position statement (0.2).	1.70	1025.00	1,742.50
2/13/25	PS	Attend internal meeting regarding high priority action items in support of mediation and phase 2 hearing (1.5); confer with individual team members regarding next steps (0.9).	2.40	1450.00	3,480.00
2/13/25	BA	Attend Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (1.5); correspond with P. Tomasco, JS, EB, and CS regarding mediation position statement and with CS regarding pretrial motion in limine for phase 2 (0.2); review and analyze research and correspondence regarding privilege issues and correspond with litigation team regarding same (0.5).	2.20	1200.00	2,640.00
2/13/25	JS	Continue preparation for mediation (2.0) and Phase 2 of assumption litigation (5.5).	7.50	1025.00	7,687.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/13/25	SR	Attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5); conduct document review regarding energy consumption data in connection with ██████ request and team correspondence regarding the same (3).	3.50	750.00	2,625.00
2/13/25	TB	Begin research regarding third-party information sharing requested by EB.	2.40	1200.00	2,880.00
2/13/25	CS	Attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.6); continue drafting motion in limine for phase 2 hearing (4.0); draft mediation statement (4.9).	9.50	850.00	8,075.00
2/13/25	CHH	Draft memorandum regarding targeted search findings in support of phase 2 (1.5); attend daily checkpoint teleconference regarding phase 2 document review (0.5); attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5);	2.50	350.00	875.00
2/13/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of ██████ phase 2 and damages claims.	1.70	350.00	595.00
2/13/25	JH	Attend teleconference with PS, EB, BA, JS, VO, CS, PB, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); attend teleconference with HM, TT, CHH, ASA, and NC to discuss the collection of documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (0.6); begin collecting documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (2.0).	3.10	350.00	1,085.00
2/13/25	JH	Review Bankruptcy trial transcripts to determine which of the exhibits filed under seal were admitted under seal, rather than admitted publicly, for PB review.	2.20	350.00	770.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/13/25	PB	Preparation for trial Phase 2, including analysis of exhibits admitted in Phase 1 (3.9); attend teleconference with PS, EB, BA, JS, VO, CS, SR, CHH, MV, JHA, and ASA regarding strategic and high-priority Phase 2 action items and follow-on call regarding mediation strategy (1.5).	5.40	850.00	4,590.00
2/13/25	ASA	Analyze invoices and conduct targeted searches for supporting documentation at request of HM in support of Phase 2 preparation efforts (7.0); attend daily checkpoint teleconference regarding phase 2 document review (0.5); attend portion of Stris team meeting regarding high priority action items in support of mediation and phase 2 hearing preparation (0.5).	8.00	350.00	2,800.00
2/13/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	9.50	700.00	6,650.00
2/13/25	TT	Attend daily checkpoint teleconference with HM, ASA, EB, JHA, to prepare for phase 2 targeted document review (0.4); analyze and summarize additional [REDACTED] for EB in preparation for phase 2 (11.0).	11.00	525.00	5,775.00
2/13/25	MV	Provide attorney CS with requested filed versions of exhibits in support of upcoming deposition (1.5); attend teleconference with PS, EB, BA, JS, VO, CS, PB, SR, CHH, JHA, and ASA regarding strategic and high-priority Phase 2 action items (0.5); conduct additional target searches for documents related to disputed invoices, review hits, correspond with team regarding the same, and save for further attorney review (4.0).	6.00	425.00	2,550.00
2/14/25	EB	Review, propose revisions to, and correspond with Stris team and co-counsel regarding mediation brief (0.5); review updates from TT and attend to high priority phase 2 action items including analysis in support of cross-examinations (1.2).	1.70	1250.00	2,125.00
2/14/25	BA	Review and revise draft mediation statement prepared by CS, correspond with JS regarding strategy for same, and and review further edits from JS and P. Tomasco (2.4); draft proposed response to Whinstone's counsel regarding phase 2 hearing, correspond with litigation team regarding same, and convey same to M. Moore (0.7).	3.10	1200.00	3,720.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/14/25	BA	Participate in teleconference with [REDACTED] and PB to assess status of invoices as relevant to preparation for phase 2 hearing.	.40	1200.00	480.00
2/14/25	JS	Work on mediation preparation and related issues.	2.20	1025.00	2,255.00
2/14/25	SR	Continue conducting document review regarding energy consumption data in connection with [REDACTED] request (0.8); continue reviewing and analyzing materials and drafting notes in support of [REDACTED] claims, damages, and expert analysis (4.2).	5.00	750.00	3,750.00
2/14/25	TB	Continue research regarding regarding third party disclosures for EB and JS.	2.40	1200.00	2,880.00
2/14/25	CS	Continue drafting and revising mediation statement (1.6); continue drafting motion in limine for phase 2 hearing (1.5)	3.10	850.00	2,635.00
2/14/25	CHH	Attend daily checkpoint teleconference regarding phase 2 document review (0.6); update targeted search findings memorandum in support of phase 2 (0.5); attend teleconference regarding invoices with [REDACTED] [REDACTED] (Rhodium), PB, BA, and ASA (0.4); assist HM with invoice review in support of phase 2 (3.5); review JS email regarding Quinn Emanuel document request and continue working on same (0.2).	5.20	350.00	1,820.00
2/14/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	5.30	350.00	1,855.00
2/14/25	JH	Attend teleconference with HM, TT, CHH and ASA to discuss the collection of documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (0.5); continue collecting documents tagged in the phase 2 review and found via targeted search that are related to outstanding or contested invoices from Whinstone (4.0); distribute updated exhibit list tracking which exhibits from Bankruptcy Phase 1 were admitted under seal or publicly to attorney team at PB request (0.5).	4.00	350.00	1,400.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/14/25	PB	Preparation for trial Phase 2 (3.6); teleconference with [REDACTED], BA, and ASA regarding Phase 2 issues (0.4); attend internal discovery team meeting regarding Phase 2 issue analysis (0.5).	4.50	850.00	3,825.00
2/14/25	ASA	Attend teleconference regarding invoices with [REDACTED] (Rhodium), Ashley Jonson (Rhodium), PB, BA, and CHH (0.4); conduct targeted searches for invoice documentation and assist HM with drafting of memorandum in support of phase 2 preparation efforts (5.7); gather privilege log material at request of PB (0.2).	6.30	350.00	2,205.00
2/14/25	HM	Review, analyze, and prepare documents and potential exhibits for phase 2 hearing.	5.50	700.00	3,850.00
2/14/25	TT	Attend daily checkpoint teleconference with HM, PB, JH, CH, AA regarding phase 2 targeted invoice searches (0.6); continue analyzing and summarize [REDACTED] testimony regarding [REDACTED] for EB (7.1).	7.70	525.00	4,042.50
2/14/25	MV	Qc internal document with exhibit admission tracker (0.2); assist with further targeted searches for attorney review (0.3).	.50	425.00	212.50
2/15/25	EB	Review and analyze memorandum from co-counsel and related materials and correspond with BA, TB, and JS regarding next steps in support of assessment of action items resulting from same.	1.50	1250.00	1,875.00
2/15/25	BA	Review analysis of potential phase 2 invoices prepared by HM to prepare for phase 2 trial.	.30	1200.00	360.00
2/15/25	JS	Prepare for presentation to Special Committee regarding damages complaint.	3.50	1025.00	3,587.50
2/15/25	TB	Consider issues and engage in further legal research regarding third party disclosures.	1.60	1200.00	1,920.00
2/15/25	HM	Finalize and circulate phase 2 invoice document analysis memorandum in preparation for the phase 2 hearing.	1.50	700.00	1,050.00
2/16/25	EB	Review and correspond with HM regarding memorandum analyzing phase 2 invoices and related documents (0.3); review and respond to further correspondence from BA, TB, JS, and co-counsel regarding research and update to [REDACTED] (0.5).	.80	1250.00	1,000.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/16/25	BA	Review draft memorandum from LKC regarding privilege issues and correspond with JS, EB, and TB regarding strategy and potential issues relevant to privilege concerns.	.40	1200.00	480.00
2/16/25	JS	Prepare for (1.5) and confer (0.8) with Special Committee regarding potential damages claims; attend board meeting regarding mediation (2.3); work on mediation follow-up (1.0).	5.60	1025.00	5,740.00
2/16/25	TB	Review memorandum regarding third party disclosures and advise regarding duties of directors.	2.80	1200.00	3,360.00
2/17/25	VO	Confer with PS, EB, and JS regarding mediation and strategy (0.6); confer with JS regarding same (0.4).	1.00	1025.00	1,025.00
2/17/25	PS	Attend teleconference with EB, VO, and JS regarding mediation preparation and case strategy.	.60	1450.00	870.00
2/17/25	EB	Continue working on high priority phase 2-related action items including assessing materials for cross-examination and materials relating to invoices (5.0); review and correspond with BA and JS regarding analysis from TT regarding Building D [REDACTED] (0.4); attend teleconference with PS, VO, and JS regarding mediation preparation and case strategy (0.6); confer with TT regarding transcript analysis in support of phase 2 cross-examinations (0.2); attend teleconference with BA, JS, PB, and co-counsel to prepare for meet and confer (0.5); correspond with BA, VO, JS, co-counsel and clients regarding mediation preparation (0.1); review and correspond with BA, VO, JS, and LKC co-counsel regarding revisions to objection to Whinstone proof of claim (0.3).	7.10	1250.00	8,875.00
2/17/25	BA	Participate in teleconference with JS, EB, PB, and P. Tomasco to prepare for meet and confer with Whinstone's counsel regarding phase 2 hearing (0.5); participate in meet and confer with Whinstone's counsel regarding phase 2 hearing (0.4); review and revise draft objection to Whinstone's proof of claim, correspond with litigatoin team regarding same, and correspond with P. Tomasco regarding edits to same (0.5); continue preparing for mediatoin and phase 2 hearing, including reviewing deposition [REDACTED] analyses, conferring with JS regarding hearing strategy, and correspond with JS, PB, and EB regarding potential phase 2 issues (2.2).	3.60	1200.00	4,320.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/17/25	JS	Assist in preparation for mediation (2.3) and prepare for Phase 2 trial (1.4).	3.70	1025.00	3,792.50
2/17/25	TB	Analyze additional documents and research regarding third party information sharing.	2.40	1200.00	2,880.00
2/17/25	CS	Continue drafting motion in limine for Phase 2 hearing.	6.90	850.00	5,865.00
2/17/25	PB	Prepare for Phase 2 hearing, including preparation of testimony of [REDACTED] and compilation of exhibits and cross-examination material (4.8); teleconference with JS, BA, EB, P. Tomasco, and J. Cohn regarding mediation and key Phase 2 action items (0.5).	5.30	850.00	4,505.00
2/17/25	TT	Confer with EB to coordinate review and summary of [REDACTED] regarding phase 2 (0.2); continue analysis and summary of prior [REDACTED] testimony of two [REDACTED] witnesses (6.0).	6.20	525.00	3,255.00
2/18/25	VO	Attend mediation planning call with client representatives and co-counsel (0.6); prepare for mediation (4.3).	4.90	1025.00	5,022.50
2/18/25	EB	Attend teleconference with VO, clients, and co-counsel to prepare for mediation (0.5); continue assisting with information and analysis in support of same (1.2); review and analyze additional documents and correspondence from MV and CHH regarding [REDACTED] invoice and correspond with [REDACTED] and Stris team regarding follow-up questions regarding same (0.9); continue working on additional high priority phase 2 action items (2.0); attend phase 2 document review checkpoint teleconference to advise regarding additional action items (0.7); coordinate hot seat and graphics support for phase 2 (0.2).	5.50	1250.00	6,875.00
2/18/25	BA	Prepare for mediation and phase 2 hearing.	1.00	1200.00	1,200.00
2/18/25	JS	Assist in preparation for mediation (1.3); attend teleconference regarding exit financing issues (1.1); prepare for Phase 2 trial (1.5).	3.90	1025.00	3,997.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	SR	Continue reviewing and analyzing materials and drafting notes in support of [REDACTED] claims, damages, and expert analysis (3.7); review and analyze EB and [REDACTED] correspondence relating to [REDACTED] invoices in connection with the same (0.9); review correspondence and correspond with CHH regarding latest [REDACTED] calculations to assist EB (0.3).	4.90	750.00	3,675.00
2/18/25	CS	Begin drafting Phase 2 opening slides (2.5); review and potential exhibits for Phase 2 hearing (1.2)	3.70	850.00	3,145.00
2/18/25	CHH	Assist EB, BA, and JS with targeted searching regarding curtailments in support of phase 2 (1.0); update internal targeted searching memorandum in light of same (0.2); attend daily checkpoint teleconference with EB, PB, and HM regarding phase 2 document review (0.7); assist EB, PB, and HM with further targeted searching in light of same (1.5); assist PB with [REDACTED] (Rhodium) direct preparations (0.1).	3.50	350.00	1,225.00
2/18/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	1.20	350.00	420.00
2/18/25	PB	Attend daily checkpoint teleconference with EB, PB, HM, and CH regarding phase 2 document review (0.7); follow-up call with CH regarding same (0.3); draft direct examination outline for Phase 2 testimony (3.8).	4.80	850.00	4,080.00
2/18/25	ASA	Assist EB by gathering relevant analysis by expert [REDACTED] (0.4); update internal detailed tracking memorandum (0.3); search for and identify documentation related to Phase 2 invoices (0.3).	1.00	350.00	350.00
2/18/25	HM	Attend daily checkpoint teleconference with EB, PB, HM, and CH regarding phase 2 document review (0.7); revise and continue drafting phase 2 invoices analysis memorandum (6.0).	6.70	700.00	4,690.00
2/18/25	SD	Print and compile materials for mediation session (1.1); compile mediation materials into an e-binder (0.8).	1.90	350.00	665.00
2/18/25	TT	Continue analyzing and summarizing prior [REDACTED] testimony for EB in support of phase 2 trial preparation.	8.80	525.00	4,620.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	MV	Further update and revise internal exhibit list (1.0); further review admitted trial exhibits used in Phase 1 and update official Phase 2 exhibit list regarding the same (0.5).	1.50	425.00	637.50
2/19/25	VO	Attend mediation.	9.00	1025.00	9,225.00
2/19/25	PS	Review Whinstone's emergency motion to continue phase 2 and confer with team regarding same and mediation updates.	2.40	1450.00	3,480.00
2/19/25	EB	Attend teleconference with PB regarding action items including additional phase 2 exhibit searches (0.2); review and comment on draft ████████ direct examination ████████ (0.9); attention to case management and upcoming hearing staffing (0.4); analyze additional information from ████████ regarding ████████ invoice and correspond with ████████ ████████ regarding follow-up requests (1.1); attend teleconference with SR regarding high priority ████████ and phase 2 action items (0.2); correspond with Stris team and co-counsel regarding high priority action items including ████████ deposition (0.2); prepare for same (1.5); attend teleconference with PB regarding phase 2 witness preparation and exhibits (1.0); prepare Rhodium witness preparation materials (1.9); review, propose revisions, and correspond with BA and PB regarding motion in limine (0.7); review mediation updates and correspond with Stris team members and Fulcrum regarding status and resulting action items (0.2).	8.30	1250.00	10,375.00
2/19/25	BA	Attend and participate in mediation (6); review and revise motion in limine for phase 2 and correspond and confer with team regarding same (2.8); review Whinstone's motion to continue hearing, confer with team regarding same, and begin drafting opposition to same (1.2).	10.00	1200.00	12,000.00
2/19/25	JS	Prepare for Phase 2 trial.	2.20	1025.00	2,255.00
2/19/25	SR	Confer with EB regarding ████████ and phase 2 high priority action items (0.2); review team and ████████ correspondence and documents pertaining to ████████ invoices and June 10, 2023 mining in connection with ████████ ████████ phase 2 and damages analysis (0.7)	.90	750.00	675.00

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Date	Tkpr	Description	Hours	Rate	Amount
2/19/25	CS	Review and analyze emergency motion to continue Phase 2 hearing (0.5); draft section of response to motion to continue (2.0); continue drafting Phase 2 opening slides (0.6); review edits to and revise motion in limine (2.1); prepare exhibits, declaration, and proposed order granting motion in limine (1.3) finalize and file motion in limine and supporting materials (1.4).	7.90	850.00	6,715.00
2/19/25	NC	Continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims.	2.10	350.00	735.00
2/19/25	PB	Preparation for Phase 2 trial (4.9); teleconference with EB regarding priority discovery items (0.2); teleconference with EB regarding key Phase 2 preparation issues (1.0); teleconference with JS regarding preparation for Phase 2 opening (0.3).	6.40	850.00	5,440.00
2/19/25	ASA	Support mediation efforts of attorneys ahead of Phase 2 hearing (6.5); review Whinstone's motion to continue hearing and draft shell of opposition to same at request of BA (1.0); revise internal tracking memorandum to reflect case updates and relevant preparatory material ahead of Phase 2 hearing (0.5).	8.00	350.00	2,800.00
2/19/25	HM	Revise phase 2 invoice analysis memorandum (3.6); review and analyze documents for EB (1.5).	5.10	700.00	3,570.00
2/19/25	TT	Analyze and summarize [REDACTED] testimony of Whinstone witness for EB in preparation for phase 2 (9.0).	9.00	525.00	4,725.00
2/19/25	MV	Further revise internal exhibit list to cover documents cited in draft motion in limine (4.0); correspond with QE paralegal regarding exhibit list requirements (0.1); create further targeted searches, review hits, and correspond with attorneys regarding same (2.0); pull additional documents for attorneys to be used as Phase 2 trial exhibits (0.4).	6.50	425.00	2,762.50

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Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	PS	Prepare for (1.4) and attend (0.7) teleconference with EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlinesreview draft opposition to Whinstone motion and email EB and team (0.4); attend portion of zoom with EB, BA, JS, and PB regarding high priority action items (0.4).	2.90	1450.00	4,205.00
2/20/25	EB	Confer with NC regarding status and revisions to ██████████ memorandum (0.1); attend teleconference with PS, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); confer and review and respond to correspondence with Stris team and co-counsel regarding emergency hearing and high priority action items including phase 2 contingency preparations (0.5); attend to same in consultation with Stris team and co-counsel (3.5); correspond with opposing counsel regarding Peters deposition and phase 2 agreement memorialization (); attend teleconference with BA, JS, PB, P. Tomasco, and other fiduciaries with SAFE representatives regarding mediation strategy (0.7); attend further Stris team teleconference regarding high priority action items (0.6); confer with BA, JS, and P. Tomasco regarding action items including revisions to phase 2 order and client update and convey same (0.9).	7.30	1250.00	9,125.00
2/20/25	BA	Continue drafting opposition to motion to continue and preparing for phase 2 hearing if needed, including conferring with EB regarding same and conferring with CS regarding filings (1); correspond and confer with CS regarding potential filing of opposition to Whinstone's continuance motion and potential hearing on motion in limine and confer with EB regarding potential hearing on motion in limine/status conference (0.2); participate in teleconference with P. Tomasco, mediator Mullin, SAFE representations and client representatives to discuss mediation (0.7); confer with EB, PB, JS, and PS regarding offer from SAFEs/Riot and next steps (0.6); confer with EB, P. Tomasco, and JS regarding upcoming status conference, steps to finalize agreement regarding phase 2, and mediation/offer (1); correspond with litigation and bankruptcy team regarding Rhodium and Whinstone's proposals to document agreement regarding phase 2 and (0.4).	3.90	1200.00	4,680.00

Stris & Maher LLP

Invoice # 14486

March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	JS	Attend call with SAFE group and Debtor team regarding Riot settlement offer (0.8); evaluate and move forward next steps in light of same (0.7).	1.50	1025.00	1,537.50
2/20/25	SR	Continue reviewing and analyzing materials and drafting notes in support of [REDACTED] claims, damages, and expert analysis (4.1); attend teleconference with PS, EB, CS, PB, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise Opposition to Whinstone's Continuance Motion (0.4).	5.60	750.00	4,200.00
2/20/25	CS	Attend teleconference with PS, EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise opposition to motion to continue (2.2); draft declaration in support of opposition to motion to continue phase 2 hearing and compile exhibits in support of the same (1.1); review motion in limine to prepare for hearing regarding the same (0.4); continue preparing Phase 2 opening slides (0.3).	5.10	850.00	4,335.00
2/20/25	NC	Confer with EB regarding case status and high priority action items (0.1); add additional materials and continue preparing memorandum for EB regarding annotated portions of phase 1 materials and related questions and action items in support of [REDACTED] phase 2 and damages claims (1.5).	1.60	350.00	560.00
2/20/25	PB	Preparation for Phase 2 trial, including exhibits and drafting direct examination outline (3.5); attend portion of teleconference with PS, EB, CS, SR, HM, and MV regarding action items in support of emergency hearing and Phase 2 imminent deadlines (0.7); attend teleconference with Ad Hoc Group regarding mediation (0.7); attend follow-up call with EB, JS, BA, and PS regarding same (0.6); teleconference with R. Izakelian, R. Lopez, and R. Vasquez regarding document transfer (0.2).	5.70	850.00	4,845.00
2/20/25	ASA	Create witness preparation PowerPoint at request of PB.	1.50	350.00	525.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/20/25	HM	Attend teleconference with PS, EB, CS, PB, SR, HM, and MV regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1); review and revise ██████████ deposition outline (1.0); revise phase 2 invoices analysis memorandum (1.2); review and analyze documents for phase 2 exhibit list (1.1).	4.40	700.00	3,080.00
2/20/25	MV	Continue revising exhibit list and preparing additional exhibits (3.0); review confidentiality designations and prepare exhibit cover sheets for filing (0.5); conduct additional searches for bates versions of invoices (0.5); attend teleconference with PS, EB, CS, PB, SR, HM regarding action items in support of emergency hearing and phase 2 imminent deadlines (1.1).	5.60	425.00	2,380.00
2/21/25	PS	Confer with team and plan for damages case.	.90	1450.00	1,305.00
2/21/25	EB	Confer with SR regarding high priority action items in wake of phase 2 resolution (0.2); confer with and advise Stris team members including JS, CS, and TT regarding same (0.4); attend hearing (0.1); attention to resulting action items including correspondence with co-counsel and opposing counsel and revisions to agreed order (2.6).	3.30	1250.00	4,125.00
2/21/25	BA	Prepare for and participate in status conference/hearing to discuss phase 2 issues (0.5); review draft proposed agreed orders and correspond with team regarding same (0.3).	.80	1200.00	960.00
2/21/25	JS	Continue planning for damages case.	1.50	1025.00	1,537.50
2/21/25	SR	Confer with EB regarding high priority action items in support of damages analysis and in wake of phase 2 resolution (0.2); continue reviewing materials and drafting notes in connection with the same (6.7).	6.90	750.00	5,175.00
2/21/25	CS	Attend hearing on motion to continue and motion in limine (0.2); review and revise proposed agreed order on motion to assume contracts and exhibit thereto (1.0); research statute of limitations issues for damages complaint and begin drafting memorandum regarding the same (2.9).	4.10	850.00	3,485.00
2/21/25	PB	Attend hearing regarding Phase 2 trial scheduling.	.30	850.00	255.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/21/25	ASA	Assist EB with formatting and finalizing of proposed agreed order granting Debtors' motion and supplemental motion to assume certain executory contracts with Whinstone US, Inc. prior to filing (2.0); at request of PB, excerpt relevant portions of bates-stamped documents for use in witness preparation PowerPoint (0.7); update internal status memorandum to reflect agreement and cancellation of Phase 2 hearing (0.2).	2.90	350.00	1,015.00
2/21/25	HM	Review and analyze hot documents identified in phase 2 document review.	.60	700.00	420.00
2/21/25	SD	Prepare materials for BA for 02-21-2025 hearing (0.3).	.30	350.00	105.00
2/22/25	SR	Continue reviewing materials and drafting notes in support of [REDACTED] claims, damages, and expert analysis	4.90	750.00	3,675.00
2/24/25	EB	Confer with W. Thompson (0.2) and JS (0.5) regarding status and high priority action items; attend teleconferences with [REDACTED] (0.8) regarding same and BA (0.3) regarding high priority research action items; advise TB and CS regarding research questions regarding appeal and damages complaint (0.5); attend teleconference with Stris team and A. Swartz regarding document and discovery related action items (1.1); review updates and correspond with TB and CS regarding follow-up questions (0.1); attention to case management (0.5); review updates and correspond with HM regarding [REDACTED] (0.1); review notice of appeal and update [REDACTED] regarding same (0.1); attention to resulting action items including corresponding with TB regarding additional analysis and next steps regarding same (0.3).	.40	1250.00	500.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/24/25	BA	Review order entered on motion to assume, convey same to client, correspond with PS, JS, and EB regarding potential appeal of order on motion to assume, review appeal documents filed by Whinstone, and review research on same from TB (0.4); confer with EB regarding high priority action items including appeal and document review for adversary proceeding (0.3); participate in teleconference with EB, JS, PB, HM, and A. Swartz to discuss high priority action items, including appeal of order on motion to assume and discovery matters related to adversary proceeding (1.1); review draft notice of appearance for adversary proceeding and correspond with team regarding same (0.1).	1.90	1200.00	2,280.00
2/24/25	JS	Call with EB regarding high priority action items in connection with settlement and damages case (0.5); call with EB, BA, PS, HM, SR, and A. Schwartz regarding document discovery issues in connection with damages case (1.1); review and evaluate research issues in connection with Whinstone appeal and damages case (1.7); prepare for mediation follow-up and confer with client team regarding same (2.2).	6.50	1025.00	6,662.50
2/24/25	SR	Attend teleconference with EB, BA, JS, PB, HM, A. Schwartz to discuss high priority action items relating to damages complaint (1.1); review materials and take notes in connection with the same to assist EB analysis (7.9).	9.00	750.00	6,750.00
2/24/25	TB	Review procedures and engage in legal research regarding bankruptcy appeals both to the district court and on direct certified appeal to the Fifth Circuit and plan regarding appeal of prior decisions.	5.20	1200.00	6,240.00
2/24/25	CS	Continue researching statute of limitations for fraudulent inducement claim and drafting legal memorandum regarding the same (4.1).	4.10	850.00	3,485.00
2/24/25	JH	Update bankruptcy docket.	1.00	350.00	350.00
2/24/25	PB	Prepare documents for disclosure in response to Rule 2004 request (1.0); call with discovery vendor regarding same (0.1); attend strategy teleconference with EB, BA, JS, HM, and A. Swartz regarding discovery action items (1.1).	2.20	850.00	1,870.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/24/25	ASA	Update detailed tracking memorandum to reflect case developments and precise substance of the agreed order on the motion to assume (0.3); attention to ensuring proper docket notices for attorneys in adversarial damages case at request of EB (1.4).	1.70	350.00	595.00
2/24/25	HM	Confer with PB, EB, JS, BA, SR, and A. Swartz regarding appeal of motion to assume and high priority discovery items for adversary case (1.1); coordinate with ASA and PH regarding case management and notices of filing (2.2); draft notices of appearance for adversary case (0.7).	4.00	700.00	2,800.00
2/25/25	VO	Confer with JS regarding mediation issues and strategy.	.50	1025.00	512.50
2/25/25	PS	Review JS assessment in support of settlement and briefly evaluate relevant underlying documents.	.60	1450.00	870.00
2/25/25	EB	Review initial research results from TB and CS (0.3); attend teleconference with BA regarding high priority action items including follow-up research requests (0.3); advise TB and CS regarding same (0.3); attention to discovery-related action items including document assessment and collection (1.5); advise HM regarding revisions to notice of appearance (0.1); attend checkpoint teleconference with BA, clients, and co-counsel (0.5); correspond with TT regarding instructions for upcoming [REDACTED] and revisions to prior summary (0.2); review and respond to correspondence from BA and JS regarding additional high priority analysis and action items including correspondence to opposing counsel (0.2).	3.40	1250.00	4,250.00
2/25/25	BA	Attend teleconference with EB regarding high priority action items including follow-up research requests (0.3); participate in teleconference with litigation counsel, bankruptcy counsel, and client regarding case status and strategy (0.5); review update from JS on meeting with mediator, confer with W. Thompson regarding supersedeas deposit in Milam County, research and draft proposed email to Whinstone's counsel regarding same, and convey to litigation team and bankruptcy counsel for review (0.4).	1.20	1200.00	1,440.00
2/25/25	JS	Review and evaluate SAFE note and next steps in connection with mediation (5.9); attend call with mediator and client team (1.3).	7.20	1025.00	7,380.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/25/25	SR	Continue reviewing materials and taking notes in support of [REDACTED] claims, damages, and expert analysis.	1.30	750.00	975.00
2/25/25	TB	Research and planning regarding appeal schedule and legal research regarding path going forward for appeal.	3.60	1200.00	4,320.00
2/25/25	CS	Continue researching statute of limitations issues on fraudulent inducement claim and drafting memorandum regarding the same (3.8).	3.80	850.00	3,230.00
2/25/25	HM	Review and respond to team correspondence regarding documents for use in adversary proceeding (2.5); finalize and file notices of appearance for BA and JS in adversary proceeding (0.5).	3.00	700.00	2,100.00
2/25/25	TT	Review and analyze damages complaint to assist EB with analysis of additional supporting material.	1.00	525.00	525.00
2/26/25	PS	Confer with JS regarding strategic planning.	.90	1450.00	1,305.00
2/26/25	EB	Review updated statute of limitations research from CS (0.1); correspond with BA, JS, and CS regarding revisions to same (0.1); review correspondence and initial research results from TB regarding appeal and correspond regarding same (0.1); work on discovery-related action items including coordinating and instructing Stris team regarding further [REDACTED] review (2.0); begin reviewing revised summary from TT (0.1).	2.40	1250.00	3,000.00
2/26/25	BA	Review and analyze drafts of memorandum regarding fraudulent inducement claim prepared by CS and correspond with CS, JS, and EB regarding edits to same (0.6); review AEO documents for which designation is being challenged by SAFEs and correspond with bankruptcy counsel regarding same and scheduling of meeting with SAFEs to discuss (0.4); review document preservation letter sent by Whinstone to Rhodium investors, research same, and correspond with EB regarding follow up research on nonparties' preservation obligations (0.3).	1.30	1200.00	1,560.00
2/26/25	JS	Strategic planning for damages case.	3.00	1025.00	3,075.00
2/26/25	SR	Continue reviewing materials and conducting factual research in connection with damages complaint and draft memorandum summarizing preliminary findings (7.8); correspond with EB regarding the same (0.2).	8.00	750.00	6,000.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/26/25	TB	Legal research regarding grounds for dismissal of bankruptcy appeals.	4.00	1200.00	4,800.00
2/26/25	CS	Continue reviewing and analyzing case law regarding statute of limitations for fraudulent inducement claim and continue revising memorandum regarding the same (1.9).	1.90	850.00	1,615.00
2/26/25	CHH	Assist CS with targeted searches regarding Winter Storm Uri release.	.30	350.00	105.00
2/26/25	JH	Distribute documents previously designated Highly Confidential and challenged by SAFE entities to BA, HM and PB at BA request (0.5); update bankruptcy docket (0.4); update adversary case docket (0.2).	1.10	350.00	385.00
2/26/25	PB	Prepare for teleconference with SAFEs regarding discovery matters.	.30	850.00	255.00
2/26/25	ASA	Analyze materials and revise memorandum with instructions for additional damages-related and potential privilege review as instructed by EB and HM (5.0); attend to further updates to internal detailed tracking memorandum (0.4).	5.40	350.00	1,890.00
2/26/25	HM	Review and respond to team correspondence regarding preparation for the adversary case (0.5); perform legal research for EB, BA, and JS (1.0); review and analyze discovery requests and productions for correspondence regarding Winter Storm Uri in phase 1 for EB (2.2).	3.70	700.00	2,590.00
2/26/25	TT	Analyze and summarize additional [REDACTED] testimony regarding [REDACTED].	5.50	525.00	2,887.50
2/27/25	PS	Attend teleconference with EB, BA, JS, PB, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal.	.80	1450.00	1,160.00

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	EB	Correspond with BA, TB, and JS regarding further appeal research (0.1); confer with W. Thompson regarding status and high priority action items and correspond with W. Thompson and A. Swartz regarding pro hac applications (0.2); review drafts and correspond with PS, JS and SR regarding revisions to same (0.1); review order assigning district judge Hanks and correspond with ASA and JHA regarding resulting action items (0.1); review procedure and materials from JHA regarding assigned judge and correspond with A. Swartz and SR regarding revisions resulting from same (0.6); analyze revised statute of limitations memorandum and correspond with BA, JS, and CS regarding next steps (0.2); correspond with co-counsel regarding same (0.1); work on discovery-related action items and strategy (1.1); update ██████ regarding status (0.1); attention to case management including correspond with HM regarding calendaring of additional deadlines (0.1); prepare for (0.4) and lead (1.0) Stris team teleconference to discuss high priority action items; correspond with HM, TT, and CHH to coordinate further ██████ review (0.2); review memorandum from SR regarding Uri representations, analyze related documents, and correspond with CS and SR regarding revisions to same (1.2); analyze potential next steps in light of correspondence from HM regarding third party preservation obligations and correspond with BA, JS, and HM regarding same (0.2).	5.70	1250.00	7,125.00
2/27/25	BA	Attend first half of teleconference with EB, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); confer with EB regarding appeal and adversary proceeding action items (0.2).	.70	1200.00	840.00
2/27/25	JS	Continue evaluating SAFE issues in connection with mediation (1.3); continue strategic planning for damages case (1.0); confer with ██████ regarding issues related to mediation (0.5); attend portion of teleconference with EB, BA, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); attend teleconference with SAFE group and QE regarding professional eyes only designation issue (0.2).	3.50	1025.00	3,587.50

Stris & Maher LLP

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March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	SR	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1); review team pro hac vice applications and conduct legal research in connection with the same (0.4); continue conducting factual research in connection with damages complaint (1.5).	2.90	750.00	2,175.00
2/27/25	TB	Legal research and planning regarding stay of bankruptcy proceedings in light of appeal (4.4); attend part of planning teleconference with Stris attorneys PS, EB, BA, JS, CS, PB, SR, MV, CHH, ASA, and JSA (0.5).	4.90	1200.00	5,880.00
2/27/25	CS	Attend teleconference with EB, BA, JS, PB, PS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); review and revise memorandum regarding factual background of [REDACTED] (2.4).	3.40	850.00	2,890.00
2/27/25	CHH	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); assist JS and PS with SAFE document searches (0.2); coordinate with vendor, EB, QH, and TT regarding [REDACTED] [REDACTED] and review (0.5); assist SR with preparation of pro hac vice applications for appeal (0.2).	1.90	350.00	665.00
2/27/25	JH	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); prepare notes for same (0.6); research background information on [REDACTED] for Whinstone appeal to S.D. Tex. (1.0).	2.60	350.00	910.00
2/27/25	PB	Attend portion of teleconference with EB, BA, JS, PS, CS, TB, MV, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (0.5); teleconference with JS regarding meet and confer (0.1); attend meet and confer with counsel for SAFEs regarding confidentiality issues (0.3).	.90	850.00	765.00

Stris & Maher LLP

Invoice # 14486

March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/27/25	ASA	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, MV, SR, CHH, and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal (1.0); update internal memorandum to reflect recent developments (0.2).	1.20	350.00	420.00
2/27/25	HM	Conduct research for EB and BA relating to non-party preservation obligations in support of response to correspondence asserting same.	1.50	700.00	1,050.00
2/27/25	TT	Analyze and summarize ██████████ of ██████████ in support of damages claim.	4.20	525.00	2,205.00
2/27/25	MV	Attend teleconference with EB, BA, JS, PB, PS, CS, TB, SR, CHH, ASA and JHA to discuss strategic and high-priority action items related to the adversary proceeding and district court appeal.	1.00	425.00	425.00
2/28/25	EB	Review and analyze stay research from TB (0.3); correspond with BA, TB, JS, and litigation fellows regarding follow-up questions and requests (0.1); advise NC regarding assistance with privilege log review and related research and analysis (0.2); begin analyzing same (2.8); review and respond to team correspondence regarding status and high priority action items (0.5); attention to case management (0.2); attend teleconference with TT regarding initial questions and guidance regarding further ██████████ review (0.2); attention to mediation update and resulting action items (0.1); analyze materials and work on discovery strategy (1.0).	5.40	1250.00	6,750.00
2/28/25	BA	Review pro hac motion and judge's procedures.	.30	1200.00	360.00
2/28/25	JS	Work on high priority action items in connection with damages case.	2.00	1025.00	2,050.00
2/28/25	SR	Attend to pro hac vice applications for PKS, JS, BA, and CS and correspond with team regarding the same (1.1); continue conducting factual research in connection with damages complaint (2).	3.10	750.00	2,325.00
2/28/25	TB	Analyze potential arguments, conduct research, and summarize legal issues involved in potential stay of bankruptcy proceedings.	3.50	1200.00	4,200.00

Stris & Maher LLP

Invoice # 14486

March 28, 2025

Date	Tkpr	Description	Hours	Rate	Amount
2/28/25	CS	Review and approve pro hac vice application for appeal of Phase 1 ruling to district court.	.10	850.00	85.00
2/28/25	CHH	Assist SR with preparation of pro hac vice applications for appeal (0.4); emails with EB, QH, and TT regarding [REDACTED] collection from vendor (0.2); summarize TB research regarding bankruptcy stay (0.3);	.90	350.00	315.00
2/28/25	NC	Work on preparation of privilege log as advised by EB.	5.20	350.00	1,820.00
2/28/25	JH	Check for updates in ongoing matter [REDACTED] at SR request.	.80	350.00	280.00
2/28/25	ASA	Review [REDACTED] memorandum and begin preparation of timeline of relevant events at request of EB.	1.10	350.00	385.00
2/28/25	HM	Review and revise adversary case review memorandum (0.8); continue performing research for EB (1.8).	2.60	700.00	1,820.00
2/28/25	TT	Analyze and summarize additional Rhodium communications in support of damages claim.	8.10	525.00	4,252.50
TOTAL PROFESSIONAL SERVICES					\$ 736,447.50

Stris & Maher LLP

Invoice # 14486

March 28, 2025

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Peter K. Stris	PS	Partner	11.50	1,450.00	16,675.00
Elizabeth Brannen	EB	Partner	85.00	1,250.00	106,250.00
Bridget Asay	BA	Partner	52.40	1,200.00	62,880.00
Tillman Breckenridge	TB	Partner	47.00	1,200.00	56,400.00
Victor O'Connell	VO	Partner	19.90	1,025.00	20,397.50
John Stokes	JS	Partner	87.10	1,025.00	89,277.50
Colleen Smith	CS	Associate	83.40	850.00	70,890.00
Peter Brody	PB	Associate	53.30	850.00	45,305.00
Sarah Rahimi	SR	Associate	63.70	750.00	47,775.00
Helen Marsh	HM	Associate	84.60	700.00	59,220.00
Tanya Tice	TT	Discovery Associate	142.40	525.00	74,760.00
Monica Viramontes	MV	Sr Paralegal	40.50	425.00	17,212.50
Andrew Atsalis	ASA	Fellow	71.20	350.00	24,920.00
Cynthia Huang	CHH	Fellow	49.50	350.00	17,325.00
Sebastian Delgado	SD	Fellow	2.20	350.00	770.00
Nicholas Capalbo	NC	Fellow	32.30	350.00	11,305.00
Jaida Hodge-Adams	JH	Fellow	43.10	350.00	15,085.00
Total			969.10		\$ 736,447.50

Stris & Maher LLP

Invoice # 14486

March 28, 2025

EXPENSES ADVANCED

Date	Task	Description	Amount
2/01/25		Logikcull Discovery Solutions (February 2025).	2,646.00
2/04/25		Peregrine Consultants - January 2025.	8,400.00
2/14/25		Bankruptcy court filing fee.	100.00
2/15/25		AA airfare for Dallas mediation.	521.78
2/18/25		AA lodging in Dallas for mediation.	657.96
2/25/25		Setec Investigations invoice.	3,374.68
2/26/25		AA transportation to airport.	79.20
2/28/25		Logikcull Discovery Solutions (March 2025).	2,646.00
TOTAL EXPENSES ADVANCED			\$ 18,425.62
TOTAL THIS INVOICE			\$ 754,873.12

Stris & Maher LLP

Invoice # 14486

March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14366	1/13/25	132,202.25	111,327.25	20,875.00
14459	2/21/25	840,030.97	.00	840,030.97
Previous Balance				\$ 860,905.97
Balance Due This Invoice				<u>\$ 754,873.12</u>
TOTAL BALANCE DUE				<u>\$ 1,615,779.09</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 840,030.97	\$ 20,875.00	\$.00	\$.00	\$ 860,905.97



March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14500
Client # 00346
Matter # 008

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Non-working Travel for Whinstone Dispute

Total Professional Services	\$ 26,757.50
50% discount	<u>\$ -13,378.75</u>
Net Professional Services	\$ 13,378.75
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 13,378.75

Stris & Maher LLP

Invoice # 14500

March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/18/25	VO	Travel to mediation.	4.50	1025.00	4,612.50
2/18/25	BA	Travel from Montpelier VT to Dallas TX, not otherwise billed.	4.60	1200.00	5,520.00
2/18/25	ASA	Travel from Barnstable, MA to Dallas, TX to support mediation efforts.	7.00	350.00	2,450.00
2/19/25	VO	Return travel from mediation.	3.00	1025.00	3,075.00
2/20/25	BA	Travel back to Montpelier, VT from Dallas TX following mediation.	7.50	1200.00	9,000.00
2/20/25	ASA	Return travel from Dallas, TX to Barnstable, MA after supporting mediation efforts.	6.00	350.00	2,100.00
TOTAL PROFESSIONAL SERVICES					\$ 26,757.50
50% discount					<u>\$ -13,378.75</u>
NET PROFESSIONAL SERVICES					\$ 13,378.75

SUMMARY OF PROFESSIONAL SERVICES

Name	Tkpr	Title	Hours	Rate	Total
Bridget Asay	BA	Partner	12.10	1,200.00	14,520.00
Victor O'Connell	VO	Partner	7.50	1,025.00	7,687.50
Andrew Atsalis	ASA	Fellow	13.00	350.00	4,550.00
Total			32.60		\$ 26,757.50

TOTAL THIS INVOICE**\$ 13,378.75**



March 28, 2025

Rhodium Enterprises
Charles Topping
General Counsel and Secretary
chucktopping@rhdm.com

Invoice # 14499
Client # 00346
Matter # 007

INVOICE SUMMARY

For professional services rendered through February 28, 2025

RE: Retention and Fee Applications

Total Professional Services	\$ 16,177.50
Total Expenses Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 16,177.50
Previous Balance	<u>\$ 9,832.00</u>
TOTAL BALANCE DUE	<u>\$ 26,009.50</u>

Stris & Maher LLP

Invoice # 14499

March 28, 2025

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
2/10/25	CHH	Begin working on first interim fee application.	1.00	350.00	350.00
2/11/25	VO	Emails and confer with CH regarding quarterly fee application (0.4); emails with B. Howell regarding same (0.1)	.50	1025.00	512.50
2/11/25	CHH	Draft first interim fee application.	5.50	350.00	1,925.00
2/12/25	CHH	Draft first interim fee application.	3.00	350.00	1,050.00
2/13/25	VO	Review, revise, and further prepare interim fee application.	5.30	1025.00	5,432.50
2/13/25	CHH	Assist VO with exhibits for first interim fee application.	.20	350.00	70.00
2/20/25	EB	Prepare portions of monthly fee statement.	.50	1250.00	625.00
2/21/25	EB	Prepare portions of monthly fee statement.	3.40	1250.00	4,250.00
2/21/25	NC	Assist EB with portions of fee statements.	1.80	350.00	630.00
2/24/25	VO	Work on January fee application.	1.30	1025.00	1,332.50

TOTAL PROFESSIONAL SERVICES**\$ 16,177.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Tkpr	Title	Hours	Rate	Total
Elizabeth Brannen	EB	Partner	3.90	1,250.00	4,875.00
Victor O'Connell	VO	Partner	7.10	1,025.00	7,277.50
Cynthia Huang	CHH	Fellow	9.70	350.00	3,395.00
Nicholas Capalbo	NC	Fellow	1.80	350.00	630.00
Total			22.50		\$ 16,177.50

TOTAL THIS INVOICE**\$ 16,177.50**

Stris & Maher LLP

Invoice # 14499

March 28, 2025

OUTSTANDING INVOICES

Invoice	Date	Total	Payments	Balance
14381	1/13/25	6,285.00	5,028.00	1,257.00
14472	2/21/25	8,575.00	.00	8,575.00
Previous Balance				\$ 9,832.00
Balance Due This Invoice				<u>\$ 16,177.50</u>
TOTAL BALANCE DUE				<u>\$ 26,009.50</u>

AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$.00	\$ 8,575.00	\$ 1,257.00	\$.00	\$.00	\$ 9,832.00

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	
	§	(Jointly Administered)
	§	

**ORDER ALLOWING INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES**
(Relates to ECF No. ____)

The Court, having considered the Second Interim Application for Compensation and Reimbursement of Expenses filed by Stris & Maher LLP (the “*Applicant*”), orders:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$1,821,132.59 for the period set forth in the application.
2. The Debtors are authorized to disburse any unpaid amounts allowed by paragraph 1 of this Order.

Signed:

Alfredo R. Perez
United States Bankruptcy Judge

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.